



COUNTY OF SAN DIEGO

LAND USE AGENDA ITEM

BOARD OF SUPERVISORS

GREG COX
First District

DIANNE JACOB
Second District

PAM SLATER
Third District

RON ROBERTS
Fourth District

BILL HORN
Fifth District

1

DATE: November 1, 2000

TO: Board of Supervisors

SUBJECT: REPORT ON POTENTIAL IMPACTS OF TRIBAL GAMING ON SAN DIEGO COUNTY (District: 2, 5)

SUMMARY:

Overview

In response to concerns arising from the rapid development of Class III gaming facilities on tribal lands, and the potential for significant impacts to County of San Diego resources, on August 1, 2000 (17), the County Board of Supervisors approved an initiative proposed by Supervisor Bill Horn, and amended by Supervisor Dianne Jacob, to direct the Chief Administrative Officer to conduct a comprehensive review of potential impacts of the planned casinos on traffic, the environment, public safety and health, and business development. In response to this direction, County staff has prepared this report, which presents analyses of the potential impacts of Tribal gaming on Northern and Eastern San Diego County. The report also identifies information, which would be needed to allow for a complete assessment of potential impacts.

The impacts of gaming facilities will definitely be significant on County and State roads and highways. Additionally, impacts to air quality, noise, community character, biology, and other resources are likely to be significant, although the extent of the impacts cannot be determined based on the information available at this time. Mitigating these impacts will require cooperation from the Tribes as the County's regulations, and ordinances that require projects to provide protection for natural resources and the environment do not apply on Tribal lands.

Recommendation(s)

CHIEF ADMINISTRATIVE OFFICER

1. Request the Board Sub-Committee to begin discussions with the various Tribes to develop a strategy that would allow the County to obtain adequate information needed in order to assess project-specific impacts to County jurisdictional lands and resources, and determine and implement appropriate mitigation for those impacts.
2. Request the Board Sub-Committee to ask the Tribes to consider entering into agreements with the County to address the fair-share funding of infrastructure

**ATTACHMENTS DISTRIBUTED TO EACH BOARD
MEMBER, CAO, COUNTY COUNSEL AND ON
FILE IN THE OFFICE OF THE CLERK OF
THE BOARD OF SUPERVISORS**

SUBJECT: REPORT ON POTENTIAL IMPACTS OF TRIBAL GAMING ON SAN DIEGO COUNTY (District: 2, 5)

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improvements, and ways to access funding from state and federal resources.

3. Request the Board Sub-Committee to develop agreements with the Tribes to specify which purposes local tribes would support grants to the County from the Special Distribution Fund stipulated in the Tribal-State Gaming Compacts.
4. Request the Board Sub-Committee to begin discussions with the Tribes to consider and implement the recommendations made by staff in the "Report on Potential Impacts of Tribal Gaming on Northern and Eastern San Diego County."
5. Direct the Chief Administrative Officer to draft a letter to Governor Davis asking for interpretation of the intent and language of several provisions of the Compact, which are identified as being unclear.
6. Direct the Chief Administrative Officer to instruct the County's Sacramento Representative to work with the current Administration and other interested parties, for the purpose of securing maximum funding available to the County through the budget or grant process.
7. Direct the Chief Administrative Officer to identify funding to reimburse the various County Departments for unbudgeted costs related to their work on Tribal Gaming project review and related issues.
8. Direct the Chief Administrative Officer to provide a schedule within 30 days for performance of operational assessments of road segments that will be substantially impacted by the new casino projects and casino expansion projects. The assessments are to identify minor repairs and improvements that can be accomplished before May 15, 2001 to prepare the roads as much as feasibly possible for the expected traffic increases.

Fiscal Impact

The fiscal impact of improving County roads to adequately serve gaming facilities will be very significant. It is estimated that the County's costs will be at minimum \$168 million. These costs could increase significantly based on more detailed studies. There is no identified source of funding to fund such costs.

To date, staff has incurred \$95,200 in non-budgeted costs related to Tribal gaming issues. Some of these costs can be attributed to specific gaming projects, and some of the costs were incurred to address general issues, preparing materials for the Board Conference and this report. Additionally, it is anticipated that staff will incur \$151,000 to \$201,000 in additional costs for the remainder of this fiscal year.

Business Impact Statement

The full extent of business impacts is unknown at this time, however, businesses that provide services and supplies to the gaming Tribes stand to benefit, while other businesses may lose revenues to similar competing businesses in the gaming facilities .

Advisory Board Statement

N/A

BACKGROUND:

San Diego County contains 18 separate Native American reservations, covering over 125,000 acres, and providing home to 17 tribal bands. Of these 17 tribes, 12 bands have signed the State Gaming Compact that would allow for each reservation to develop up to two casinos each on tribal lands. Of these 12 reservations, three currently have active casinos. In addition, at least six additional Class III casinos are currently being built, or are planned for construction by spring of 2001. At this time, only three (Viejas, Barona, and Sycuan) currently have active casinos. However, at least six additional casinos are currently being built, or are planned for construction by spring of 2001. These include Jamul Gaming Facility, Rincon Permanent and Interim Facilities, Pala Gaming Facility, and the San Pasqual Permanent and Interim Facilities. In addition, the Barona Facility has proposed an expansion of their existing operations and Sycuan has begun a multi-million dollar renovation project, which will include the replacement of the existing casino, and the construction of a 500-seat theater.

In response to concerns arising from the rapid development of Class III gaming facilities on tribal lands, and the potential for significant impacts to County of San Diego resources, on August 1, 2000 (17), the Board directed that County staff to comprehensively review the impacts on both North and East County due to the newly planned casinos pertaining to traffic, environment, business development, public safety and health issues. In response to the Board's direction, staff has prepared a report entitled, "Analysis of Potential impacts of Tribal Gaming on Northern and Eastern San Diego County" (Report). A copy of the Report is attached. Where information was not available or limited, staff has indicated what information would be needed in order to adequately address the potential impacts. In addition, staff included in the Report background information regarding the existing environment for each specific resource category.

Tribal-State Compact Requirements

Under the State Compact, each Tribe has the exclusive right to regulate gaming on their reservation. The State of California, in turn, oversees the tribes' regulatory processes. The County of San Diego supports the tribes' efforts to ensure self-reliance through the development of on-reservation gaming. At the same time, the County is concerned with the potential impacts to County resources resulting from the implementation of gaming on tribal lands. These concerns include not only potential impacts to environmental resources (such as biology, air quality, and the unique cultural and scientific resources found only in the County of San Diego),

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but also the definite impacts to County infrastructure, which are anticipated to be much greater than the County's ability to mitigate.

Although the State Compact requires Tribes to make a good faith effort to mitigate any and all significant, adverse off-Reservation environmental impacts, consistent with the Tribes' governmental interests, each of the four environmental assessments (EA) submitted to the County of San Diego for review has fallen short of adequately addressing these impacts. In all cases, County staff has responded, to the extent possible with short deadlines, with extensive comments regarding potential off-Reservation impacts to resources such as traffic, noise, water resources, biological resources, emergency services, air quality, and community character. Further, none of these EAs have attempted to address the potential cumulative impacts to these and other resources.

Applicability of State and County Regulations for Environmental Protection

The State of California, the County of San Diego, and other state and regional agencies have laws, regulations, and ordinances that require projects to provide protection for natural resources and the environment. These include the California Environmental Quality Act (CEQA), the County Groundwater Ordinance, the Resource Protection Ordinance (RPO), the Multiple Species Conservation Program (MSCP), and the Biological Mitigation Ordinance (BMO), among others. However, none of these regulations apply on Tribal lands. Furthermore, none of the County's laws or ordinances, including building standards, apply to projects on Tribal lands.

Report

The analyses contained in this report are the kinds of analyses performed by staff for private projects submitted to the County for review. The concerns over impacts, and mitigation measures identified in this report, are typical of these for large private projects, although the level of analysis is not at the level of detail usually required of private project developers. Staff specialists in each resource area were involved with the preparation of this report.

The staff's analysis concluded that the tribal gaming facilities have the potential to significantly impact several resource areas. Of highest concern is the potential impact that Tribal gaming will have on traffic and circulation in the County. Preliminary studies conducted by the Department of Public Works, in cooperation with the California Department of Transportation, have identified a total of approximately 56 miles of impacted County-maintained arterials, and a total of approximately 17 miles of impacted State highways. These impacted roads and highways are associated with the three existing casinos and the new casinos planned at Jamul, Pala, Rincon and San Pasqual, and are the only ones for which staff had sufficient data to prepare estimates of needed improvements and costs. For the other five potential casinos, staff has not yet received specific project descriptions and could not estimate roads impacted and costs of improvements.

Based upon an average length of impacted segment and an average improvement cost per lane mile factor, estimates of improvement costs were made. Although these estimates are preliminary, and are based upon average costs and general assumptions, the estimated total cost

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to construct improvements to these impacted roadways may amount to more than \$470 million. The County road portion of this amount is \$168 Million and the State road portion is \$302 million. For the County, the cost impacts are far beyond what traditional Capital Improvement Program funding, approximately \$7 million per year in gas tax funds) can begin to address. Therefore, such costs can only be addressed through funding from the Tribes and special State and federal funding designated to address casino impacts to San Diego County roads.

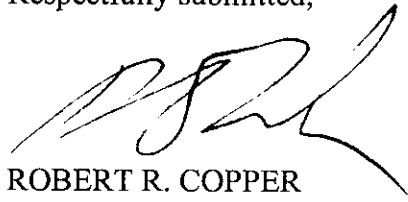
In addition to these impacts, staff concluded that there is a potential for significant environmental impacts to the following resources as a result of Tribal gaming projects: Air Quality; Biology, Community Character, Cultural Resources, Dark Skies; Hydrology and Water Quality; Noise and Water Resources. Due to the limited amount of information available to staff from the Casinos, a comprehensive, project-level assessment of these impacts could not be made at this time. Therefore, staff has recommended that the County work with the Tribes to assist in the preparation of several additional studies to adequately assess the extent of impacts to several resource areas. A complete list of staff's recommendations is included in Chapter 5 of the Report. Protection of the County's resources would be enhanced if the Tribes consulted with County staff in the preparation of analyses for the proposed casinos, particularly with regard to the scope of the analyses.

It is important to note that in addition to these adverse effects, the report points out the positive impacts these gaming facilities would bring, including the creation of more than 4,000 new jobs; improved standard of living for the Tribes; and increased sales tax revenue for the County, primarily from local businesses who provide supplies and services to the gaming Tribes.

Conclusion

By taking the specific actions identified above, and in the Report, the County will continue to work toward protecting its valuable resources, while maintaining a stable working relationship with the Tribal Nations who call San Diego County home.

Respectfully submitted,



ROBERT R. COPPER
Deputy Chief Administrative Officer

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ATTACHMENTS

SUBJECT: REPORT ON POTENTIAL IMPACTS OF TRIBAL GAMING ON SAN DIEGO COUNTY (District: 2, 5)

AGENDA ITEM INFORMATION SHEET

1

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☒ Yes *CFA*

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☒ Yes

☐ N/A

CHIEF FINANCIAL OFFICER

Requires Four Votes

J. Pechan
☒ Yes

☐ N/A

☐ Yes

☒ No

**GROUP/AGENCY INFORMATION
TECHNOLOGY DIRECTOR**

☐ Yes

☒ N/A

CHIEF TECHNOLOGY OFFICER

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☐ Yes

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Report on the Potential Impacts of Tribal Gaming on Northern and Eastern San Diego County

November 1, 2000

Prepared for the
County of San Diego Board of Supervisors
Supervisor Greg Cox, First District
Supervisor Dianne Jacob, Second District
Supervisor Pam Slater, Third District
Supervisor Ron Roberts, Fourth District
Supervisor Bill Horn, Fifth District

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Report on the Potential Impacts of Tribal Gaming on Northern and Eastern San Diego County

Chapter 1 Introduction and Purpose

San Diego County contains 18 separate Native American reservations, covering over 125,000 acres, and providing home to 17 tribal bands. Of these 17 tribes, 12 have signed Gaming Compacts with the State of California that would allow each to develop up to two Class III casinos on tribal lands. Of these 12 reservations, three currently have active casinos. In addition, at least six additional Class III casinos are currently being built, or are planned for construction by spring of 2001.

Under the State Compact, each tribe has the exclusive right to regulate gaming on their reservation. The State of California, in turn, oversees the tribes' regulatory processes. The County Board of Supervisors has expressed their support of the tribes' efforts to ensure self-reliance through the development of on-reservation gaming. At the same time, the County is concerned with the potential impacts to County resources resulting from the implementation of gaming on tribal lands. These concerns include not only potential impacts to environmental resources (such as biology, air quality), but also potential impacts to County infrastructure, and unique cultural and scientific resources found only in the County of San Diego.

The State of California, the County of San Diego, and other state and regional agencies have laws, regulations, and ordinances that require projects to provide protection for natural resources and the environment. These include the California Environmental Quality Act (CEQA), the County Groundwater Ordinance, the Resource Protection Ordinance (RPO), the Multiple Species Conservation Program (MSCP), and the Biological Mitigation Ordinance (BMO), among others. However, none of these regulations apply on Tribal lands. Furthermore, none of the County's laws or ordinances, including building standards, apply to projects on Tribal lands.

The Tribal-State Compacts require Tribes to make a good faith effort to mitigate any and all significant, adverse off-Reservation environmental impacts, consistent with the Tribes' governmental interests. Four environmental assessments (EA) have been submitted to the County of San Diego for review and County staff has responded with extensive comments regarding potential off-Reservation impacts to resources such as traffic, noise, water resources, biological resources, emergency services, air quality, and community character, which were not addressed to the satisfaction of staff. Additionally, none of these EAs have attempted to address the potential cumulative impacts to these and other resources.

In response to concerns arising from the rapid development of Class III gaming facilities on tribal lands, and the potential for significant impacts to County of San Diego resources, the County Board of Supervisors approved an initiative proposed by Supervisor Bill Horn, and amended by Supervisor Dianne Jacob, to direct the Chief Administrative Officer to conduct

a comprehensive review of potential impacts of the planned casinos on traffic, the environment, public safety and health, and business development. In response to the Board's direction, County staff has prepared this report on the potential impacts of Tribal gaming on Northern and Eastern San Diego County. The Report will be presented to the Board on November 1, 2000. The analyses contained in this report are the kinds of analyses performed by staff for private projects submitted to the County for review. The concerns over impacts, and mitigation measures identified in this report are typical of reviews prepared for large private projects.

The report also identifies additional information and studies, which are needed in order to adequately address some of the potential impacts. Finally, staff has also provided background information on the existing environment as it relates to each specific resource category.

Staff specialists in each resource area were involved with the preparation of this report. The County encourages the tribes to consult with County staff in the preparation of analyses for the proposed casinos, particularly with regard to the scope of the analyses.

Chapter 2

Gaming Facilities Included in the Analyses

In the analyses conducted by staff, consideration was given to the three existing facilities and their proposed expansions, as well as proposed gaming facilities on the remaining nine reservations that have signed the State Gaming Compact.

2.1 Existing Facilities

As discussed above, of the 12 tribal bands that have signed the State Compact, three currently have active casinos. These three casinos, Barona, Sycuan, and Viejas, have been in operation for several years. Although expansion of these facilities is anticipated to include complete Class III gaming, information regarding planned development is limited at this time. A discussion of each of the three existing facilities is included below.

2.1.1 Barona Gaming Facility

The Barona Group of the Capitan Grande Band of Mission Indians has a population of 348 on 5,903.52 acres of reservation land, located off of Wildcat Canyon Road in Community of Lakeside, in an unincorporated portion of San Diego County. Figure 2-1 shows the location of this reservation relative to other reservations in the County.

The Barona Casino consists of a 125,000 square foot casino, which operates 24 hours a day, seven days a week. The facility is served by a 400,000 gallon per day wastewater treatment facility, and has parking for 5,000 vehicles. Gambling on-site presently includes both slot machines and card tables. No hotel facilities are presently available at the Barona facility. However, proposed expansion of the facility includes a golf course, hotel, as well as parking for more than 5,000 vehicles. A discussion of the proposed expansion can be found in Section 2.2, below.

2.1.2 Sycuan Gaming Facility

The Sycuan Band of Mission Indians consists of 125 members located on approximately 380 acres, with access to the reservation off Dehesa Road in Eastern San Diego County. Figure 2-2 shows the location of this reservation relative to other reservations in the County.

The Sycuan Casino is an approximately 77,000 square foot facility. Gaming on-site includes slot machines, card tables, off-track betting, and video pull tabs. The facility operates 24 hours a day, seven days a week. Currently, no alcoholic beverages are served at the casino. Currently, the Sycuan facility is undergoing a multi-million dollar renovation/expansion. Although complete details are unknown at this time, staff understands that the new facility under construction will house all gaming operations, and include a 500-seat, Broadway-style theater. The current gaming facility will be used as an administrative center.

2.1.3 Viejas Gaming Facility

The Viejas (Baron Long) Band of Mission Indians consists of 268 members located on a 1,609-acre reservation. The reservation is located north of Interstate 8, off Willow Road, near the community of Alpine, in an unincorporated portion of San Diego County. Figure 2-1 and Figure 2-2 show the location of this reservation relative to other reservations in the County.

Current gaming facilities consist of an 110,000 square foot gaming complex. Operating 24 hours a day, seven days a week, gaming operations at the casino include slot machines, card tables, off-track betting, and bingo. Alcoholic beverages are served at the facility. In addition, the facility includes a world-class performing arts center that attracts major music and comedy acts, and an outlet center.

2.2 Proposed Facilities

Where available, information on the proposed facilities was gathered from submitted environmental assessments prepared by the tribes and their consultants.

East County Reservations

2.2.1 Barona Expansion

As discussed above, the Barona Group of the Capitan Grande Band of Mission Indians currently operates gaming facilities on their 5,903.52 acres of reservation land, located off of Wildcat Canyon Road in the community of Lakeside, in an unincorporated portion of San Diego County.

The proposed gaming facility expansion includes a 233-acre golf course, a 125-room, three story hotel, an additional 2,600 parking spaces for a total of 5,163 parking spaces, and a 293,000 square foot gaming facility. The casino will include slot machines, card tables, track betting, and bingo. A 750,000 gallons-per-day wastewater treatment plant will service the facility. The facility will be open 24 hours a day; seven days a week, and does not propose to serve alcoholic beverages.

2.2.2 Jamul Gaming Facility

The Jamul Indian Village, a Kumeyaay Nation, has a population of 57 members, located on a six-acre Rancheria off Highway 94, in eastern San Diego County (see Figure 2-2).

According to communications from their consultant, Environmental Science Associates, the tribe's proposed development includes the development of a two-story, 245,000 square foot hotel and casino, with six food venues, off-site parking for employees, underground casino parking, and 250 hotel rooms. In addition, the proposed development includes an on-site sewage treatment plant, and proposes to use imported water from the Otay Water District. It is unlikely that all of the proposed facilities will be placed on the six-acre Rancheria, given the size. In order to accommodate the non-gaming, support facilities (i.e. parking, food venues, etc.), additional land would be needed. It is staff's understanding that the tribe is

presently pursuing placement of additional lands in trust, and/or the purchase of additional fee-lands to accommodate the development.

North County Reservations

2.2.3 Pala Gaming Facility

The Pala Band of Mission Indians is located five miles east of Interstate-15 in the northern portion of the County of San Diego, approximately four miles south of Riverside County on California State Route 76. The Pala tribe has a documented population of 881 members on a 10,754.77-acre reservation. The land uses surrounding the reservation include vacant, undisturbed lands, residential uses and agricultural uses. Directly adjacent to the Pala Reservation to the east is the Pauma and Yuima Reservation (see Figure 2-3).

The Pala Casino and Entertainment Center will consist of an 187,300 square foot gaming and entertainment facility on a 24-acre site to be located entirely on the reservation. The facility will be designed to look like a contemporary California-style lodge. The main floor of the casino will cover approximately 136,700 square feet and will consist of the casino, numerous restaurants and the entertainment facility. All administrative offices, surveillance areas, support services including the Tribal Gaming Authority, and an employee cafeteria will be located on a lower level approximately 41,800 square feet in size. A large food storage area will also be located on the lower level in an 8,800 square foot facility.

The main level of the casino will house 60,500 square feet of gaming, consisting of 1,500 slot machines, 60 table games, six poker tables, and 25 off-track betting seats, and will include separate VIP and non-smoking areas. The main casino area will also include a 20,800 square foot multi-purpose room, which can be configured for a 1,200-seat bingo area, a 2,000 square foot concert theater, a 1,700-seat boxing arena, or a 900-seat banquet hall.

The facility's restaurants, to be located on the main level of the casino, will include a 500-seat buffet of which 125 seats will be located on an outside veranda, a 100-seat fine dining restaurant, a 40-seat deli, and a coffee and ice cream bar. There will be a 60-foot promenade leading to the outdoor veranda, which, in addition to dining areas, will contain a 60-seat bar and lounge with a stage for musical guests. In addition, there will be a 350-seat entertainment bar and lounge of which 125 seats will be located outdoors in a park-like setting. The entertainment lounge will have a stage that can be configured to seat 700 for boxing or other entertainment. The remainder of the main level will consist of an entrance lobby, bus lobby, a small retail area, restrooms, and miscellaneous support services facilities. It is estimated that approximately 5,000 patrons will visit the casino and entertainment facility on a daily basis.

The remainder of the 24-acre development site will contain entrance features, including a porte cochere and fountain, access to SR-76, and a 1,400-space parking area. Parking for buses and a separate bus entrance will be located to the northeast of the facility.

2.2.4 Rincon Temporary Gaming Facility

The Rincon Band of Mission Indians has a population of approximately 682 members, on a 3,932.04-acre reservation, located off of Valley Center Road in Valley Center, in unincorporated portion of San Diego County (see Figure 2-3).

The Rincon Gaming Facility proposes a small interim facility consisting of a 34,000 square foot facility on 65 acres. It will be open 24 hours per day, seven days a week. No hotel or golf facilities are proposed at this time. The casino will house a variety of games, including slot machines and various table card games, and alcoholic beverages will be available. In addition, a wastewater treatment facility will be built to service the operation. Specific information regarding facility design and parking arrangements is currently unavailable.

2.2.5 Rincon Permanent Gaming Facility

The Rincon permanent gaming casino will consist of a 200-room hotel, a 45,000 square foot casino, and 10,000 square feet of conference/entertainment area. In addition, the proposed facility includes a 250-seat buffet restaurant, a 125-seat specialty restaurant, a 90-seat bar lounge, a 50-seat coffee shop, and 1,800 square feet of retail space. The interim facility will serve as the main casino during construction of the 180,000 square foot permanent facility. Once the larger facility is complete, the interim facility will be knocked down to make room for additional parking.

2.2.6 San Pasqual Temporary Gaming Facility

The San Pasqual Indian Reservation encompasses approximately 1,379.58 acres of land west of Valley Center. The reservation is accessed from Lake Wohlford Road, a County of San Diego Circulation Element road (see Figure 2-3).

The San Pasqual interim gaming facility will consist of a 77,000 square foot casino, a 4,155 square foot dining area, a 1,260 square foot buffet restaurant, and retail and ancillary areas totaling 15,325 square feet. The development area will encompass approximately 16 acres of tribal lands. The design also allows for an expansion area of approximately 30,000 square feet. The project also covers the reservation infrastructure that will be required to operate the casino. This includes a commercial wastewater disposal system with a pretreatment gallery, water system development, parking and associated circulation roads.

2.3 Other Anticipated Gaming Facilities

In addition to the proposed facilities identified in Section 2.2 above, other facilities have been proposed on tribal lands. However, limited information is presently available regarding these facilities.

2.3.1 Ewilaapaayp Gaming Facility

The Ewilaapaayp Band of Mission Indians has a population of approximately nine members on a 4,104.15-acre reservation, located off of Willows Road in the Community of Pine Valley. The reservation is located approximately three miles from Mount Laguna in the eastern portion of the County of San Diego (see Figure 2-1).

The Ewiiapaayp proposes to locate a gaming facility on an approximately ten-acre parcel located approximately 1 mile west of the existing Viejas Casino. The parcel is the site of an existing Indian Health center. The gaming facility proposes to replace the health facility and develop approximately six acres, while the health facility will be relocated to the rear of the facility. Golf and hotel facilities are not anticipated in the initial planning phases, but may be included at a later time. Parking has also not been determined. The casino will house class III games and will be open 24 hours a day, seven days a week.

2.3.2 La Jolla Gaming Facility

The La Jolla Band of Luiseno Indians consists of 652 members on an approximately 7,950-acre reservation located off Highway 76, adjacent to the Rincon Reservation in northern San Diego County (see Figure 2-3). At present no detailed information is available regarding the proposed gaming facilities on this reservation. However, the Band has signed the State Gaming Compact, and as such development is anticipated. In addition, at the Tribal Gaming Roundtable sponsored by Supervisor Bill Horn on September 7, 2000, the Treasurer of the La Jolla Band indicated that current plans for the gaming on-site would consist of less than 350 slot machines.

2.3.3 Campo Gaming Facility

The Campo Band of Mission Indians consists of 293 members on an approximately 15,480-acre reservation located off Interstate 8 and State Route 94, in east San Diego County (see Figure 2-2). The Campo Reservation consists of two separate portions of land. The first is a small portion of land located off State Route 94, while the second portion is located approximately 2 miles east of the smaller section. At present no information is available regarding the proposed gaming facilities on this reservation. However, the Band has signed the State Gaming Compact, and as such development is anticipated.

2.3.4 Manzanita Gaming Facility

The Manzanita Band of Mission Indians consists of 96 tribal members located on a 3,579-acre reservation in east San Diego County (see Figure 2-2). At present no information is available regarding the proposed gaming facilities on the Manzanita Reservation. However, the Band has signed the State Gaming Compact, and as such development is anticipated.

2.3.5 Pauma Gaming Facility

The Pauma Band of Luiseno Indians consists of 135 members located on the Pauma and Yuima Reservation, encompassing a total of 5,877 acres off Highway 76, in northern San Diego County (see Figure 2-3). At present, the only available information regarding the proposed facilities for the Reservation is taken from the Traffic Impact analysis prepared by the traffic consultants hired by the Rincon Band of Mission Indians for the Rincon Casino. The consultants state that the Pauma Facility will consist of 40,000 square feet of gaming space, speciality restaurants, gift shops, and office space.

2.3.6 San Pasqual Permanent Gaming Facility

As discussed above, the San Pasqual Indian Reservation encompasses approximately 1,379.58 acres of land west of Valley Center, off Lake Wohlford Road (see Figure 2-3). At present no detailed information is available regarding the proposed gaming facilities on this reservation. However, at Supervisor Horn's Roundtable, Chairman Allen Lawson indicated that the permanent facility would be a 195,000 square foot resort, and that the \$120 million dollar resort would take to about two years to construct.

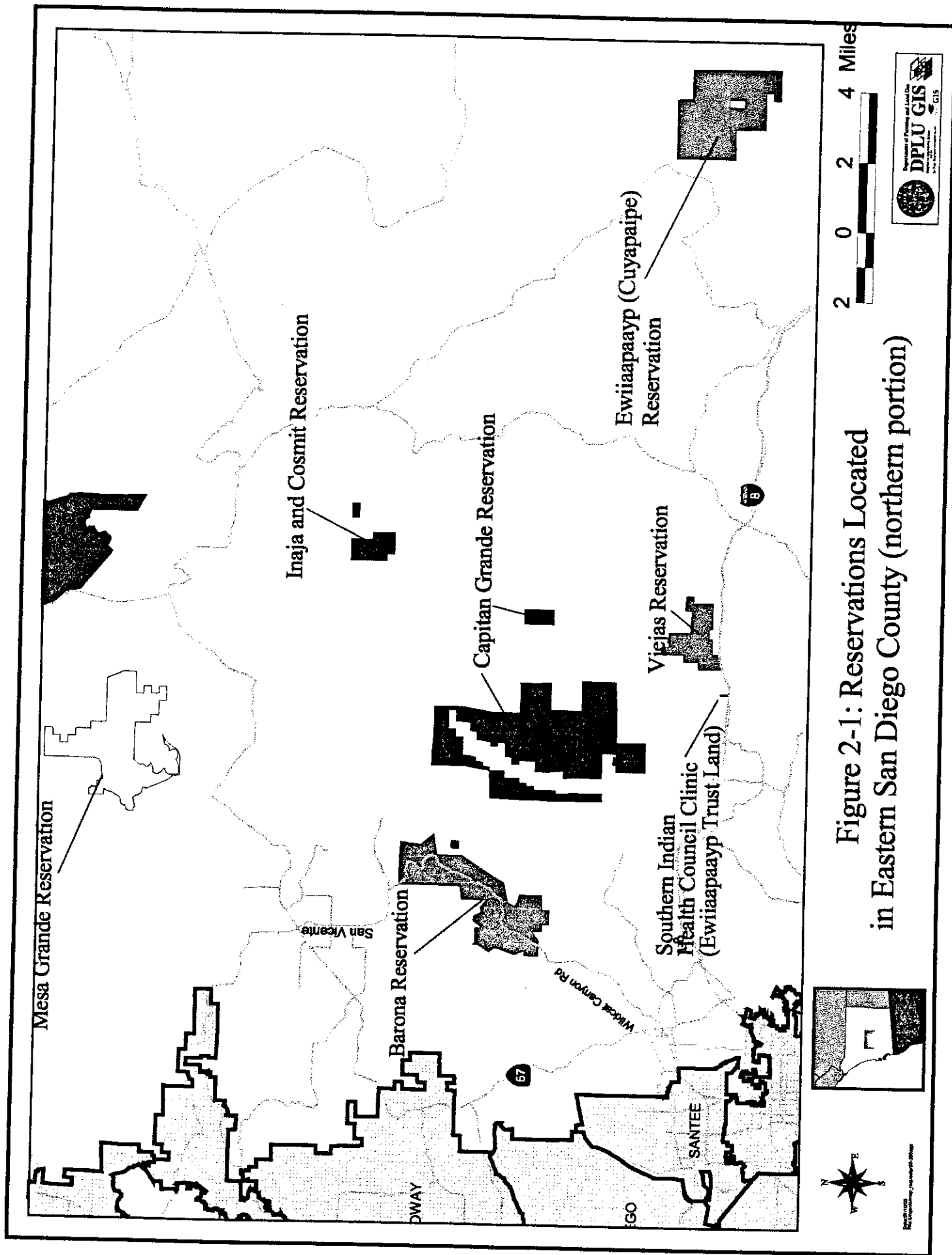
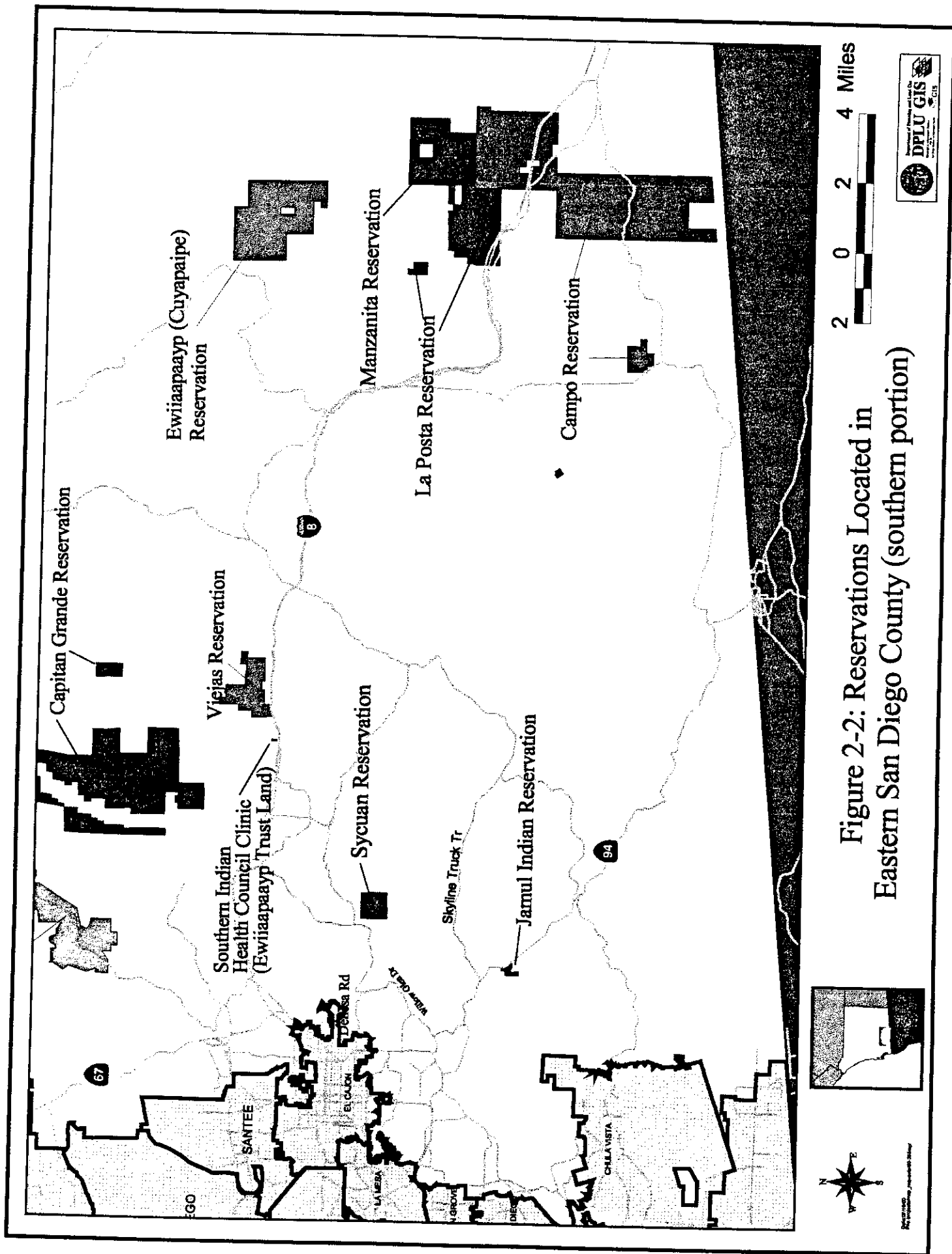


Figure 2-1: Reservations Located in Eastern San Diego County (northern portion)

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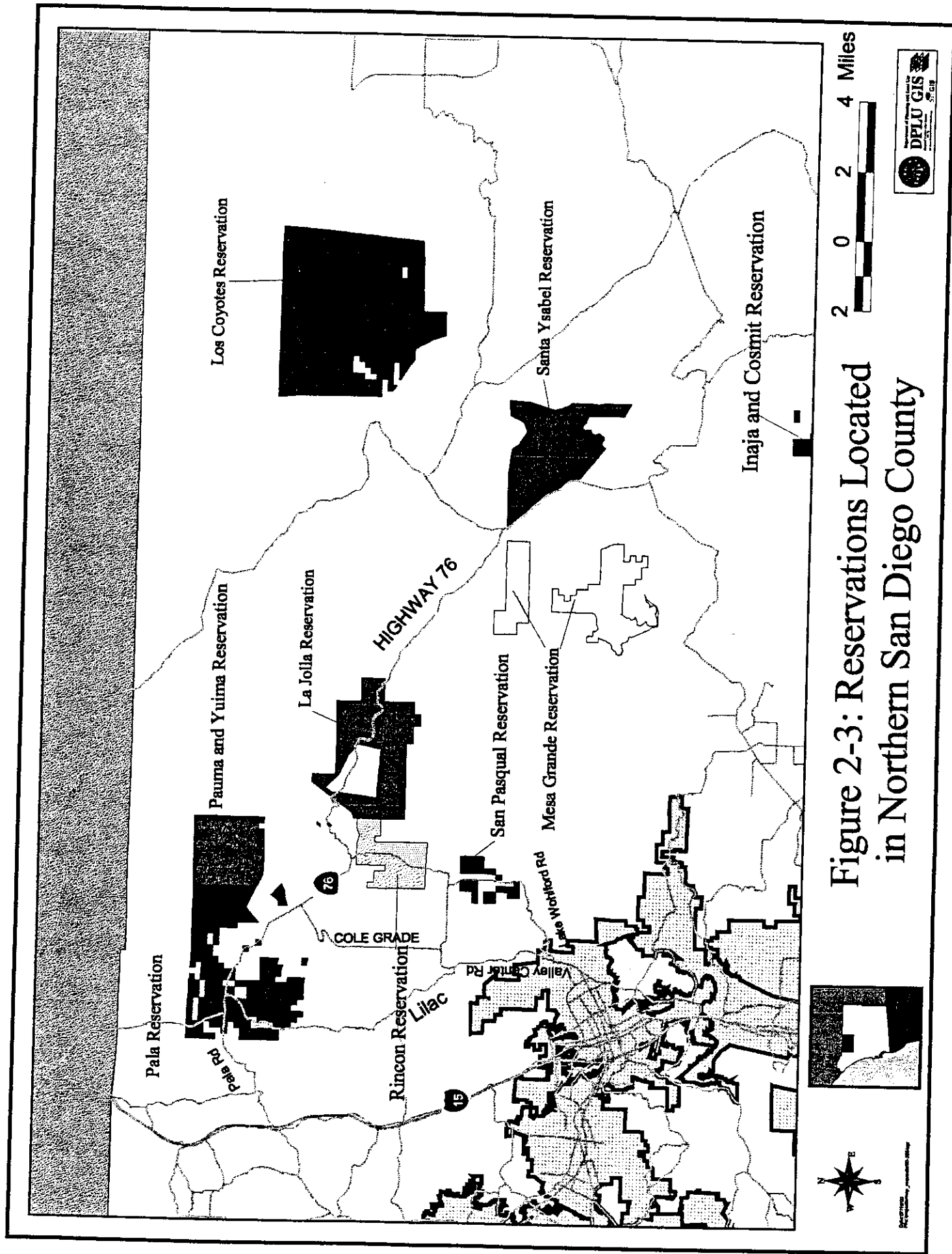


Figure 2-3: Reservations Located in Northern San Diego County

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Chapter 3

Potential Environmental Impacts by Resource Area

Potential off-reservation impacts to traffic and circulation; air quality; dark skies, cultural resources, noise; biological resources; and water resources and hydrology (both surface water and groundwater) were reviewed by staff. In addition, issues concerning community character, conformance with the County's General Plan update (GP2020), public safety, and health services were reviewed. The following is staff's review of the potential off-reservation impacts of the proposed tribal gaming facilities on environmental resources of San Diego County. Since most environmental impacts on several resource areas are the direct result of roadway conditions, analysis of impacts to Traffic and Circulation are presented first, followed by other impact areas in alphabetical order.

3.1 Traffic and Circulation

A preliminary traffic assessment of the off-reservation impacts to County-maintained arterials and State highways near the proposed Indian Gaming projects in the San Diego Region has been prepared by the Department of Public Works (see Appendix A). The report assesses the potential traffic impacts associated with proposals to expand and/or develop Indian Gaming facilities on five reservations within San Diego County. These are Barona, Jamul, Pala, Rincon, and San Pasqual. The Pauma, La Jolla, Ewiiapaayp (Cuyapaip), Campo and Manzanita Tribes have each signed a State Compact for class III Indian Gaming, but have not yet submitted specific project descriptions. Roads, which could potentially be impacted by future Indian Gaming development on these reservations, are estimated from the analyses conducted for the Indian Gaming projects for which traffic information was submitted.

3.1.1 Background

Level of Service (LOS) qualitatively measures traffic operations by comparing traffic volumes to roadway capacity. The capacity of a roadway is based on either the current design of the road or the future Circulation Element classification/design. LOS is defined by categories LOS A through LOS F. LOS A represents the most ideal traffic conditions (free flow), while LOS F represents severe traffic congestion (gridlock).

The County's Public Road Standards identifies LOS thresholds for all Circulation Element roadway classifications. The County's Public Facility Element (PFE) has established LOS D as the minimal acceptable standard for Circulation Element roads. According to the PFE, discretionary projects must avoid significantly impacting Circulation Element roads that currently operate below LOS E and/or avoid causing Circulation Element roads to fall below LOS D. If a project is projected to have a significant impact to a County Circulation Element road, appropriate mitigation measures must be provided.

County-maintained arterials and State highways near the existing and proposed Indian Gaming projects, which are currently operating below the LOS D standard, are identified below:

- **County-maintained Arterials**

- Mapleview Street (Ashwood Street to Lake Jennings Park Road) – LOS E
- San Vicente Road (Main Street to Gunn Stage Road) – LOS E
- Wildcat Canyon Road (Barona Entrance to Willow Road) – LOS F
- Willow Glen Drive (Steele Canyon Road to Jamacha Road/SR 54) – LOS E
- Cole Grade Road (Fruitvale Road to Valley Center Road) – LOS E
- Valley Center Road (Cole Grade Road south to Lake Wohlford Road) - LOS E/F
- Willows Road (West Willows Road to Viejas Entrance) – LOS E
- Dehesa Road (Willow Glen Drive to El Cajon City line) – LOS D/E

- **State Highways**

- State Route 67 (Willow Road to Mapleview Street) – LOS F
- State Route 94 (north of Avocado Boulevard to Lyons Valley Road) - LOS E

Current Improvement Plans

It should be noted that the County-maintained roads that provide access to the three existing Indian gaming facilities Barona, Sycuan, and Viejas are currently operating below LOS D. These include Wildcat Canyon Road, Dehesa Road and Willows Road. The County of San Diego has negotiated with the respective Indian Tribes to obtain funding toward and/or make improvements to portions of these roads.

It should also be noted that improvements to Valley Center Road (Cole Grade Road south the Lake Wohlford Road) and Cole Grade Road (Fruitvale Road to Valley Center Road) are currently scheduled in the County of San Diego's Capital Improvement Program. These sections of road are scheduled to be improved from 2 to 3 lanes (continuous left turn lane). Caltrans is also scheduled to provide operational improvements to SR 94. Construction of these improvements, however, will take 6 to 7 years to complete. However, the County's and Caltrans' improvement plans do not mitigate the impacts from the proposed Indian gaming facilities.

3.1.2 Analysis of Potential Impacts

Potential traffic impacts from the proposed tribal gaming facilities are as follows:

3.1.2.1 Individual Projects

Potential near term traffic impacts were assessed by estimating the number of trips generated for the individual Indian Gaming facility and then distributing the estimated trips onto the existing road network. Trip generation estimates for the proposed Indian Gaming facilities were based upon driveway counts that were available for the existing Barona Indian Gaming facility. Actual traffic generation for each facility may vary. Competition and saturation of the potential gaming market from the proposed gaming facilities may also lower the average trip generation rate.

If the additional traffic generated by a proposed Indian Gaming facility caused the LOS for an existing road or highway to fall below a LOS D, a significant impact was identified as potential. A significant impact was also identified if the additional traffic generated by a proposed Indian Gaming facility significantly increased the traffic volume on an existing road or highway currently operating below LOS D, even though the LOS did not fall below LOS D. Potential near term traffic impacts of the proposed Indian Gaming facilities are as follows:

Barona Gaming Facility

- Maplevue Street (Ashwood Street to Lake Jennings Park Road) – LOS E
- San Vicente Road (Main Street to Gunn Stage Road) – LOS E
- Wildcat Canyon Road (Barona Entrance to Willow Road) – LOS F
- Willow Road (SR 67 to Wildcat Canyon Road) – LOS F
- State Route 67 (Willow Road to Maplevue Street) – LOS F

Jamul Gaming Facility

- Jamacha Boulevard (Sweetwater Road to Grand Avenue) – LOS E
- Jamacha Road (Willow Glen Drive to Washington Avenue) – LOS E
- Steele Canyon Road (Willow Glen Drive to SR 94) – LOS E/F
- Willow Glen Drive (Steele Canyon Road to Jamacha Road/SR 54) – LOS E
- State Route 94 (north of Avocado Boulevard to Lyons Valley Road) – LOS E

Pala Gaming Facility

- Cole Grade Road (Cool Valley Road to Valley Center Road) – LOS E
- State Route 76 (I-15 to Lilac Road) – LOS F

Rincon Gaming Facility

- Valley Center Road (Cole Grade Road south to Lake Wohlford Road) – LOS E/F

San Pasqual Gaming Facility

- Lake Wohlford Road (Woods Valley Road to Valley Center Road) – LOS E
- Lilac Road (Old Castle Road to Valley Center Road) – LOS E
- Valley Center Road (Cole Grade Road south to Lake Wohlford Road) – LOS E/F

3.1.2.2 Cumulative Impacts

In addition to the direct impacts discussed above, potential near term cumulative traffic impacts were assessed by distributing the estimated trips associated with all of the proposed Indian Gaming facilities onto the existing road network. A cumulative traffic impact was

identified if the additional traffic generated by a proposed Indian Gaming facility significantly increased the traffic volume on an existing road or highway currently operating below LOS D as a result of the combined traffic from all of the proposed Indian Gaming projects. Potential near-term, cumulative traffic impacts of the proposed Indian Gaming facilities are as follows:

- Lake Wohlford Road (Woods Valley Road to Valley Center Road) – LOS E
- Lilac Road (Old Castle Road to Valley Center Road) – LOS E
- Valley Center Road (Cole Grade Road south to Lake Wohlford Road) - LOS E/F
- Cole Grade Road (Cool Valley Road to Valley Center Road) – LOS E
- Valley Center Road (Cole Grade Road north east to SR 76 Pala Road) – LOS E
- State Route 76 (I-15 to Lilac Road) – LOS E

By comparison with the above projects, the future Indian Gaming projects on the Pauma and La Jolla Reservations will further impact SR 76. Future Indian gaming projects on the Campo, Ewiiapaayp, and Manzanita reservations would likely impact I-8 and to a lesser degree SR 94. County-maintained roads used to access these projects, would also be impacted.

Potential near term traffic impacts were assessed by estimating the number of trips generated for the individual Indian Gaming facilities and then distributing the estimated trips onto the ultimate road network (County's General Plan Circulation Element). A SANDAG Series 9 20-year forecast was used to provide the base volumes for the ultimate road network. Development of the proposed Indian Gaming projects will also impact the Circulation Element of the County of San Diego's General Plan. At build-out, with the proposed Indian Gaming projects, several Circulation Element Roads and State highways near the proposed Indian Gaming Projects are projected to operate below LOS D. These are as follows:

County-maintained Arterials

- Pala Temecula Road (SR 76 to Riverside County line) – LOS F
- Cole Grade Road (Cool Valley to Valley Center Road) – LOS E/F
- Valley Center Road (Lilac to Lake Wohlford Road) – LOS E/F
- Lake Wohlford Road (Valley Center Road to Valley Center Road) – LOS F
- Woods Valley Road (Valley Center Road to Lake Wohlford Road) – LOS D/F
- Ashwood Street (Willow Road to Maplevue Street) – LOS F
- Wildcat Canyon Road (San Vicente Road to Willow Road) – LOS E/F
- Willow Road (SR 67 to Wildcat Canyon Road) – LOS F

State Highways

- SR 94 (Jamacha Road to Otay Lakes Road) – LOS F
- SR 76 (I-15 to Cole Grade Road) – LOS F

3.1.3 Needed Roadway Improvements

Prior to construction of a road improvement project many studies must be completed. Implementation of roadway improvement projects requires several key steps. Figure 3-1 provides a graphical representation of these key steps. As can be seen, these steps include the following; 1) identification of purpose and need, 2) Project Studies Report (for State highways) or an opportunities and constraints report (for County arterials), 3) Environmental Impact Statements/Environmental Impact Reports, 4) Preliminary Engineering, and Detailed Engineering. In addition, prior to construction, required permits must be obtained, mitigation measures implemented and right-of-way acquired. It would take approximately 7 years to construct major improvements to a State highway and approximately 4 years to construct major improvements to a County arterial.

Over the years, most improvement projects on the rural highways have addressed safety and operational concerns such as intersection upgrades, curve corrections, passing lanes, adding shoulders, etc. In recent years, however, the County and Caltrans have experienced increasing difficulty in developing these operational and safety projects. This is due to the increasing environmental sensitivity in the rural corridors that are rich in biological, historical, and visual resources. Organized resistance to improvement projects from interest groups in the backcountry communities has also surfaced. For example, residents along Wildcat Canyon Road have voiced opposition to any project that would widen this road to four lanes. In addition, a “passing lanes” project on SR-94 is currently delayed as the Negative Declaration was legally challenged. Caltrans considered the elements of the suit and agreed that an EIS/EIR is the appropriate document.

Estimates

The total miles of impacted County-maintained arterials is 56.47 miles. The total miles of impacted State highways is 17.29 miles. Based upon an average length of impacted segment and an average improvement cost per lane mile factor, estimates of improvement costs were made. These estimates are very preliminary and are based upon average costs and general assumptions. Actual costs for each improvement project will vary based upon environmental constraints, mitigation measures, engineering features, right-of way acquisitions, and other factors. The estimated total cost to construct improvements to County-maintained arterial is approximately \$168 million. The estimated total cost to construct improvements to the State highways is approximately \$302 million. Table 3-1 below provides a breakdown of the costs attributable to each reservation.

Table 3-1: Indian Gaming Road Improvement Cost Summary

Casino	County Arterial Costs	State Highway Costs	Combined Costs
Barona	\$ 69,444,000	\$ 13,400,000	\$ 82,844,000
Jamul	\$ 25,776,000	\$ 200,900,000	\$ 226,676,000
Pala	\$ 76,726,000	\$ 5,644,000	\$ 82,370,000
Rincon	\$ 2,946,000	\$ 24,185,000	\$ 27,131,000
San Pasqual	\$ 8,129,000	\$ 35,259,000	\$ 43,387,000
Sycuan	\$ 3,564,000	\$ 0	\$ 3,564,000
Viejas	\$ 4,086,000	\$ 0	\$ 4,086,000
All Projects	\$ 167, 958,000	\$ 302,100,000	\$ 470,058,000

Table Source: California Department of Transportation and the County of San Diego Department of Public Works

Funding

In the case of the County, the approximately \$168 million in estimated needed improvements is beyond the reach of what can be funded with the \$7 million average annual San Diego County gas tax funds available for capital improvements. TRANSNET funds from the 1987 San Diego County approved Proposition A (the San Diego Transportation Improvement Program) have been fully allocated and are not available. Although some have suggested an extension of the TRANSNET sales tax, it cannot be assumed that such an extension would provide sufficient funds. Extension of the TRANSNET sales tax will also require approval by a 2/3 vote, which cannot be assured.

The normal funding methods for road improvements cannot meet the anticipated need for road improvements. Commitments should be obtained from the Indian Tribes for funding contributions towards the needed road improvements. These could serve as a local match to help leverage federal and/or state funding for the needed road improvements. Attempts should also be made to obtain special one-time state and/or federal funding.

Some of the Tribes have expressed their willingness to pay their "fair share" to mitigate impacts. Calculation of fairshare contributions toward road and highway improvements should be based upon a detailed cost estimate that has been assessed after the road improvement project have been identified, environmental constraints have been assessed and preliminary cost estimates prepared. The actual cost for completion of each road improvement project will vary considerably as the project is developed. Other factors should also be considered in the calculation of fairshare contributions. These include 1) the percentage of the road improvement cost that will not receive State, federal and/or County funding; 2) other development projects in the area which will generate traffic on the road or highway being improved; and 3) the time frame when the construction activity will take place.

Traditionally, funding for capacity increasing projects for the San Diego Region are directed by SANDAG and are part of the State Transportation Improvement Plan (STIP). Priorities and commitments have been established for the currently allocated State and federal funds. Improvements to rural highways, due to this expansion of Indian Gaming, would compete region-wide for additional funding as it becomes available. Other potential funding sources include:

- The revenues generated from the Compacts to fund transportation infrastructure. The Tribes have established a Reservation Transportation Authority with representation from each of the Tribes. One of the goals for this group is to lobby for those funds to be returned and invested in the region. However, as stated in Section 4.2.1.2, it is unclear how much revenue will be available.
- State funding from the Interregional Improvement Plan (IIP) approved by the CTC may be appropriate to deal with the impacts.
- Federal funds associated with Tea 21 might be another source, although limited, as California only receives \$5 million per year for the entire state.

3.1.4 Conclusions and Recommendations

A detailed cumulative traffic impact study should be prepared to assess the near term cumulative traffic impacts of all of the proposed Indian Gaming projects. The Indian Tribes should be encouraged to collaborate on the completion of this study. The exchange of information would help each tribe complete their study and the pooling of resources would help pay for the study. The study should also be updated to account for additional and/or expanded Indian Gaming projects that may be proposed in the future.

These additional studies should be conducted to validate the trip generation and assessment assumptions utilized within this report. Trip generation rates of Indian Gaming facilities in the San Diego region should be documented and an average rate for analysis developed. Trip generation rates may vary from facility to facility and may also vary due to the dramatic increase in the total number of gaming facilities that will be provided in San Diego County. In addition, an evaluation should also be made to discern whether a peak hour traffic assessment would be more representative of the operations of the two-lane rural arterials servicing the proposed Indian Gaming projects.

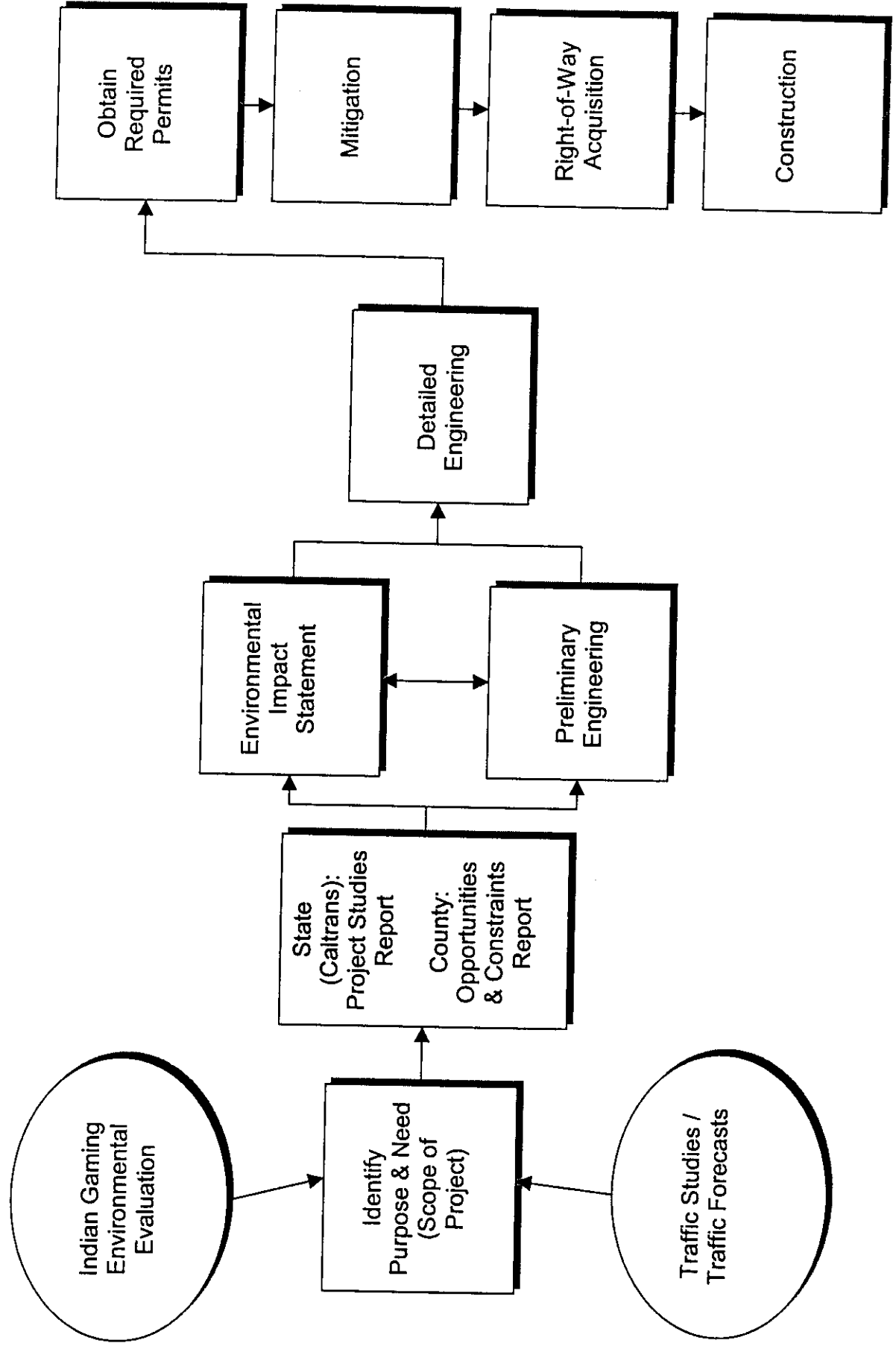
Several rural, County-maintained arterials and State highways were constructed many years ago prior to the adoption of the current highway standards. Improvements to several County-maintained arterials and State highways will be needed in the near term as the Indian Gaming projects develop. Operational studies should be conducted to determine which operational and safety improvements should be implemented in the near term. Initial studies to assess the environmental and engineering constraint for road capacity improvements to impacted County arterials and State highways should also be conducted. These studies should include an operational study/road survey for Lake Wohlford Road and a project studies report for SR 76 east of I-15.

During the General Plan 2020 project that is being processed by the County of San Diego the arterial and highway corridors near the Indian Reservations should be examined to ensure the appropriate Circulation Element classification and land use pattern to ensure that the LOS D standard can be satisfied.

Based on these conclusions, the staff has the following recommendations:

- 3-1 The County of San Diego should encourage the tribes to coordinate the preparation of a cumulative traffic impact assessment. This assessment should address the issues outlined above. Wherever possible, the County of San Diego should attempt to work with the tribes to ensure that where information is available from the County it can be provided to the tribes in a timely manner, and vice-versa.
- 3-2 The County of San Diego should negotiate with the Tribes to obtain fairshare contributions toward road improvements to roads and highways that are impacted by the proposed Indian Gaming projects. Fairshare calculations for construction costs should be made after the completion of initial studies in order to define the improvement projects, assess environmental constraints and prepare preliminary engineering.
- 3-3 Given the substantial costs of needed roadway improvements, the County of San Diego and the Tribes should actively seek State and federal funds to construct needed improvements.
- 3-4 Wherever possible, the County and the Tribes should collaborate on the submission of viable road improvement projects to State and Federal agencies to construct.
- 3-5 General Plan 2020 should examine the arterial and highway corridors in order to ensure appropriate Circulation Element Classification and land use patterns to satisfy a LOS D standard.

Figure 3-1: State Highway / County Arterial Roadway Improvement Process



3.2 Air Resources

3.2.1 Background

Activities on each of the reservations may result in direct impacts to air resources in the San Diego Air Basin (SDAB) due to transport phenomenon resulting from meteorological conditions, including wind patterns. However, the source of impacts of highest concern are not stationary sources of air pollution associated with activities on the Reservations, but the potential impacts resulting from emissions of products of combustion from motor vehicle sources along roadways providing access to the casinos. In order to understand these impacts, it is important to understand the setting in which they occur.

3.2.1.1 Federal Air Quality Regulations and Standards

At the federal level, the Environmental Protection Agency (EPA) has been charged with implementing the national air quality programs. The EPA's air quality regulatory authority is the Federal Clean Air Act (CAA) signed into law in 1970, and the subsequent Clean Air Act Amendments (CAAA) of 1977 and 1990. Although the EPA deals primarily with global, international, national, and interstate air pollution, the CAA and CAAA grant authority to the EPA to regulate air pollution on many levels. On the state level, the EPA is responsible for oversight of the state air quality programs. In addition, the EPA sets federal vehicle and stationary source emission standards, and provides research and guidance for state and regional/local air quality programs.

Under the CAA and CAAA, the EPA was required to establish National Ambient Air Quality Standards (NAAQS) for several air pollutants. The pollutants of main concern include ozone (O_3), carbon monoxide (CO), oxides of nitrogen (NO_x) expressed as nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and particulate matter smaller than 10 microns in diameter (PM_{10}). These standards represent the allowable atmospheric concentrations at which the public health and welfare are protected, and include a reasonable margin of safety to protect the more sensitive populations (e.g. the elderly, infirm, and young).

Two types of NAAQS have been established, primary standards, to protect human health; and secondary standards, to protect public welfare from non-health-related adverse impacts (such as visibility reduction). The NAAQS were defined for specific averaging times for each pollutant. The NAAQS for all averaging periods other than annual are defined as the maximum acceptable concentrations that may not be exceeded more than once per year. The annual NAAQS may never be exceeded. Table 3-2 below lists the current Federal NAAQS by averaging time.

In addition, the CAA (and its subsequent amendments) required each state to prepare an air quality control plan referred to as the State Implementation Plan (SIP). The CAAA of 1990 additionally required states containing areas that violate the NAAQS to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is a living document that is periodically modified to reflect the latest emissions inventories, planning documents, and rules and regulations of air basins as reported by the agencies with jurisdiction over them. The EPA has the responsibility to review all state SIPs to determine if they conform to the requirements of the CAA Amendments, and will achieve air quality

goals when implemented. If the EPA determines a SIP to be inadequate, it may prepare a Federal Implementation Plan (FIP) for the non-attainment area, and may impose additional control measures. As a whole, FIPs tend to be more stringent than SIPs, and most jurisdictions make every effort to ensure their SIP is adequate.

EPA Authority on Tribal Lands

Under the CAA (and its subsequent amendments, the EPA has been authorized to treat Indian tribes as states and to provide financial assistance (42 U.S.C. §7601(d)). Under an 1998 rule, eligible tribal governments may elect to develop their own air quality management programs and can designate tribal land as nonattainment areas. Where tribal governments choose not to implement air programs, the EPA has authority under the CAA to ensure implementation of programs necessary to protect tribal air resources and to make attainment/nonattainment designations for tribal areas. EPA is required to consider each Indian government as a distinct entity exercising sovereign powers and must consult with tribal governments on matters that directly affect the tribes. EPA recognizes tribal governments as the primary parties for setting standards, making environmental policy and managing programs for reservations. EPA also provides training for tribal environmental officers through the Institute for Tribal Environmental Officials, and makes grants to tribal governments.

Indian Tribes are not required to develop operating permit programs, although the EPA encourages Tribes to do so. The EPA expects that most Tribes will not develop full permitting programs under Title V of the CAA. On February 12, 1998, EPA issued a final rule governing tribal air quality plans. In February 1999 it finalized a rule to implement permitting for stationary sources on tribal lands lacking an EPA-approved Tribal operating permit program. This program is consistent with the Agency's Indian Policy, which provides that EPA will administer environmental programs on reservation lands until a Tribe assumes full regulatory responsibility.

3.2.1.2 State Air Quality Regulations and Standards

The state agency responsible for coordination and oversight of both state and local air pollution control programs in California is the Air Resources Board (ARB), a branch of the California Environmental Protection Agency (CalEPA). The ARB is also responsible for implementing its own air quality legislation called the California Clean Air Act (CCAA), which was adopted in 1988.

The ARB's primary responsibility is to develop and implement air pollution control plans designed to achieve and maintain the NAAQS established by the EPA. Although the ARB has primary responsibility, and produces a major portion of the SIP for pollution sources that are state-wide in scope (e.g. motor vehicles), it relies on local air districts to provide additional strategies for sources under their jurisdiction. The ARB combines its data with the data provided by the local air districts and submits the complete SIP to the EPA. As such, the SIP consists of the emissions standards for vehicular sources set by the ARB, and the attainment plans adopted by the local air districts and approved by the ARB.

To ensure attainment of the NAAQS, and to improve California's air quality, the ARB has established, pursuant to California Health and Safety Code (CH&SC) §39606(b) and its predecessor statutes, a stricter set of standards called the California Ambient Air Quality Standards (CAAQS). The CAAQS are defined as the maximum acceptable pollutant concentrations that are not to be equaled or exceeded, depending on the specific pollutant and averaging times. Table 3-2 below lists the current CAAQS by averaging time.

Further duties of the ARB include the monitoring air quality. The ARB has established and maintains, in conjunction with local air pollution control districts a network of sampling stations known as the State and Local Air Monitoring Station (SLAMS) network. These stations monitor what the pollutant levels are in ambient air around the monitoring station.

ARB is also responsible for setting emission standards for motor vehicles, consumer products, small utility engines, and off-road vehicles. Lastly, the ARB is primarily responsible, in conjunction with the local air districts, for developing and maintaining the California AB2588 Air Toxic "Hot Spots" program.

3.2.1.3 Regional Air Quality Regulations

State law recognized that air pollution does not respect political boundaries, and as such required the ARB to divide the state into separate air basins based on geographical and meteorological conditions [CH&SC §39606(a)]. Originally, air pollution was regulated by separate, county air pollution control districts (APCDs). In some areas, basin wide districts spanning several counties have developed (e.g. the South Coast Air Quality Management District (SCAQMD) covers Los Angeles, Orange, Riverside, and the non-desert portions of San Bernardino County). In the County of San Diego, protection and regulation of air quality is the responsibility of the San Diego County APCD. The state and federal standards have been adopted by the APCD for assessing local air quality impacts.

Air districts, like the APCD, have the primary responsibility for control of air pollution from all sources other than emissions from motor vehicles, which is the responsibility of the ARB and EPA. Under federal and state law, air districts are required to adopt and enforce rules and regulations to achieve state and federal AAQS, and enforce applicable state and federal laws. Since the passage of the CCAA and the CAA and Amendments, this role has been expanded to include the implementation of transportation control measures, and indirect source control programs to reduce mobile source emissions. On tribal lands, the authority of air districts is limited to very specific circumstances. However, in general, air quality regulatory authority on tribal lands is the sole responsibility of the EPA, or Tribal EPA (if one exists).

3.2.1.4 Regional Air Quality Plans

The EPA designates all areas of the United States as having air quality better than the NAAQS ("attainment"), worse than ("non-attainment") the NAAQS, or "unclassified" in areas where insufficient data exists. A non-attainment designation means that a primary NAAQS has been exceeded more than three discontinuous times in 3 years in a given area. Pollutants in an area are often designated as unclassified when there is a lack of data for the EPA to form a basis of attainment status. Currently, San Diego County is listed as a "severe" non-attainment area for the O₃ NAAQS, and is either unclassified or listed as in

attainment for the remaining NAAQS. A complete listing of the attainment status by pollutant for San Diego County is shown on Table 3-3. In addition, to "attainment" and "non-attainment" designations, some areas which were originally designated "non-attainment" but subsequently demonstrated compliance with the NAAQS, are defined as "maintenance areas". San Diego County is considered a "maintenance area" for carbon monoxide. As a result, particular care is required to ensure that exceedences of this pollutant do not occur.

In addition, since the EPA Indian Policy and the CAA authorizes it to treat Tribes as individual States, the EPA may designate tribal lands as being in "attainment" or "non-attainment". At this time, no tribal specific designation has been made for the tribes in Southern California. As such, tribal lands are viewed in the context of the SDAB attainment status.

Just as the EPA designates air basins as being in "attainment" or "non-attainment" of the NAAQS, the ARB designates areas of the state as either in attainment or non-attainment of the CAAQS. An area is deemed "non-attainment" if the CAAQS has been exceeded more than once in 3 years. Currently, San Diego County is listed as non-attainment for the CAAQS for both PM₁₀ and O₃. Table 3-3 provides the current CAAQS attainment status for San Diego County for each pollutant.

For each non-attainment area within the state, the CCAA has specified air quality management strategies that must be adopted by the agency responsible for the non-attainment area. Each area must prepare and adopt air quality management plans (AQMPs) or regional air quality strategies (RAQS) which lay out a program for attaining the CAAQS and NAAQS for all criteria pollutants except PM₁₀. At present, no PM₁₀ attainment plan is required by the statutes (CH&SC §40911 et.seq.). All attainment plans must demonstrate a five-percent-per-year reduction in non-attainment air pollutants or, in the case of O₃, their precursors. In cases where this reduction rate is not feasible, alternative strategies must be identified, and every feasible control measure implemented.

The San Diego County RAQS was initially adopted in 1991, and subsequently revised in 1995, again in 1998, and is scheduled for additional revision in 2001. The RAQS outlines APCD's plans and control measures designed to attain the state air quality standards for O₃. In addition, the APCD relies on the SIP, which includes the APCD's plans and control measures for attaining the O₃ NAAQS. These plans accommodate emissions from all sources, including even natural sources, through implementation of control measures, where feasible, on sources to attain the standards.

The RAQS relies on information from the San Diego Association of Governments (SANDAG) including the SANDAG Transportation Control Measures Plan (TCM Plan), as well as information regarding projected growth in the County, to identify strategies for the reduction of stationary source emissions through regulatory controls.

3.2.1.5 APCD Rules and Regulations

As discussed above, state law provides that local air districts such as the APCD have primary responsibility for controlling emissions from non-mobile (stationary) sources. The stationary source control measures identified in the RAQS and SIP have been developed by

the APCD into regulations through a formal rulemaking process. Rules are developed to set limits on the amount of emissions from various types of sources and/or by requiring specific emission control technologies (ECTs). Following rule adoption, a permit system is used to impose increased burden of controls on new and modified stationary sources and to ensure compliance with regulations by prescribing specific operating conditions or equipment on a source.

3.2.2 Analysis of Potential Impacts

Air quality at a given location can be described by the concentrations of various pollutants in the atmosphere. Units of concentration are generally expressed in parts per million (ppm) or micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). The significance of a pollutant concentration is typically determined by comparing the concentration to an appropriate federal and/or state ambient air quality standard. As discussed above, these standards represent the allowable atmospheric concentrations at which the public health and welfare are protected, and include a reasonable margin of safety to protect the more sensitive receptors in the population. Table 3-4 contains a listing of typical sources of each of the criteria pollutants, the recognized health effects, and typical controls applied for each.

Impacts are generally evaluated by comparing the sum of pollutant concentrations from a proposed project and existing pollutant levels (background) to the appropriate standard. This is often done by using a Gaussian dispersion model, such as the EPA's Industrial Source Complex (ISC) Model. Gaussian models work on the premise that pollutant concentrations are diluted over time and distance from the source, due to mixing caused by meteorological conditions. A myriad of air dispersion models exist, from simple dispersion models that require only a few parameters (e.g. SCREEN3), to models that require reams of data and mainframes to run (e.g. Urban Airshed Model). Some models are geared toward emissions from stationary sources (e.g. stacks, ponds, or buildings), while others are designed to evaluate emissions from motor vehicles idling at intersections. In general, the intent of a modeling analysis is to demonstrate that the proposed source emissions will not interfere with the attainment or maintenance of the NAAQS or CAAQS, and, if applicable, will not adversely affect air quality in specially designated areas known as Class I Airsheds.

As discussed above, San Diego County is presently designated as non-attainment for the NAAQS and/or CAAQS for Ozone (O_3) and Particulate Matter Less than 10 Microns (PM_{10}). That is, the air quality in San Diego County has exceeded a primary NAAQS more than three discontinuous times in 3 years, and/or the CAAQS for a given pollutant has been exceeded more than once in 3 years. As such the highest concern is whether a project would result in a cumulatively considerable net increase of PM_{10} or exceed quantitative thresholds for O_3 precursors, oxides of nitrogen (NO_x) and Volatile Organic Compounds (VOCs). Since O_3 is a secondary pollutant (i.e. O_3 is not directly emitted, but results from complex chemical reactions in the atmosphere from precursor pollutants) control of the precursors is required. Therefore, control of emissions of reactive or volatile organic compounds (ROCs or VOCs) and oxides of nitrogen (NO_x), the O_3 precursors, is essential.

The RAQS relies on information from the San Diego Association of Governments (SANDAG) including the SANDAG Transportation Control Measures Plan (TCM Plan), as well as information regarding projected growth in the County, to identify strategies for the

reduction of stationary source emissions through regulatory controls. Since APCD only regulates non-mobile (stationary) sources, only the stationary source control measures identified in the RAQS and SIP have been developed by the APCD into regulations. The rules are developed to set limits on the amount of emissions from various types of sources and/or require specific emission control technologies (ECTs). Following rule adoption, a permit system is used to impose increased burden of controls on new and modified stationary sources and to ensure compliance with regulations by prescribing specific operating conditions or equipment on a source. With any increase in emissions from mobile sources not accounted for in the RAQS and SIP, additional controls must be applied to stationary sources, if air quality is to continue to improve in the air basin.

Combustion of fossil fuels by motor vehicles is the primary source of pollutants of concern in San Diego County. Cold starts and idling engines result in the highest emissions of products of combustion, including carbon monoxide and ozone precursors. When traffic levels result in level of service deterioration, vehicles are forced to travel at slower speeds, and idle longer along roadways. This results in significant increases in emissions from these vehicles. When the level of service of a roadway deteriorates enough to result in "gridlock" patterns, the possibility of localized exceedences of the State and Federal AAQS' can occur. These localized exceedences are known as "hot spots". Currently, San Diego County is designated as "attainment" for carbon monoxide. However, with significant increases in traffic levels, and deterioration of roadway level of service, this attainment status could be lost due to increases in "hot spot" exceedences. Further, significant emissions of volatile organic compounds and other ozone precursors, could result in additional exceedences of the ozone standards, preventing attainment of air quality objectives in the San Diego Air Basin.

3.2.3 Conclusions and Recommendations

As discussed in the Traffic and Circulation Section, several roadways to and from the proposed gaming facilities will exist at Level of Service "D" or below. As such, deterioration of these roadways may result in development of "hot spots" for volatile organic compounds, carbon monoxide, and other products of combustion. Further, these impacts may have long-term ramifications, since they may adversely affect attainment progress. Although traffic from existing facilities has been incorporated into current SANDAG models, until SANDAG incorporates trips generated by casino visitors and employees into their regional modeling, emissions from motor vehicles have the potential to exceed those estimated in the RAQS and the SIP. Possible ramifications from this non-conformity include the loss of federal funds for use in transportation projects and other air quality improvement projects. Further, since APCD is solely responsible for regulation of stationary sources, these increases in mobile source emissions will need to be offset by stricter controls on industrial and other stationary sources. However, the potential exists that these stricter controls may not be sufficient.

As discussed above, emissions of criteria pollutants associated with increased traffic levels from both individual casinos, and cumulative projects may have significant impacts to air quality in the San Diego Air Basin. These impacts may result in delays in meeting ambient air quality goals as outlined in the State Implementation Plan and the Regional Air Quality Strategy. Further, degradation of air quality in the region may result on a localized ("hot spot") level.

Based on these conclusions, staff recommends the following:

- 3-6 In order to adequately assess the impacts from roadway LOS degradation, extensive modeling of those roadways whose LOS is expected to degrade to "D" or below should be undertaken. The County of San Diego should work with the tribes to see that these assessments are prepared, and that they not only address impacts resulting from the traffic increases and level of service degradation, but also assess the viability of traffic improvements that could mitigate impacts.
- 3-7 Recommend that the County encourage local Tribes to work with the EPA in establishing air quality programs on their reservation, and to work with the APCD planners in developing air quality management plans for their tribal lands consistent with the San Diego County RAQS and the current SIP.
- 3-8 County staff, including long-range planning staff from the Air Pollution Control District, should work to assess the viability of the current RAQS and SIP in light of the rapid changes in transportation patterns associated with the development of the gaming facilities.
- 3-9 County staff should work with the tribes to assess the viability of alternative means of transportation to/from the gaming facilities, in an effort to offset traffic level of service degradation, and reduce impacts from associated emissions. Such transportation control measures could then be included in future, triennial updates to the RAQS and SIP.
- 3-10 County staff, in conjunction with the Tribes should work towards obtaining grants from the EPA Tribal Programs to assist in offsetting the costs associated with these studies and developing tribal environmental programs that work in conjunction with existing County programs.

Table 3-2: Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	Federal Standards	
		Concentration	Primary	Secondary
Ozone (O ₃)	1 Hour	0.09 ppm (180 µg/m ³)	0.12 ppm (235 µg/m ³)	Same as Primary Standard
	8 Hour	—	0.08 ppm (157 µg/m ³)	
Respirable Particulate Matter (PM ₁₀)	Annual Geometric Mean	30 µg/m ³	—	Same as Primary Standard
	24 Hour	50 µg/m ³	150 µg/m ³	
	Annual Arithmetic Mean	—	50 µg/m ³	
Fine Particulate Matter (PM _{2.5})	24 Hour	No Separate State Standard	65 µg/m ³	Same as Primary Standard
	Annual Arithmetic Mean		15 µg/m ³	
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m ³)	9.0 ppm (10 mg/m ³)	None
	1 Hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)	—	
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	—	0.053 ppm (100 µg/m ³)	Same as Primary Standard
	1 Hour	0.25 ppm (470 µg/m ³)	—	
Lead	30 Day Average	1.5 µg/m ³	—	—
	Calendar Quarter	—	1.5 µg/m ³	Same as Primary Standard
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	—	0.030 ppm (80 µg/m ³)	—
	24 Hour	0.04 ppm (105 µg/m ³)	0.14 ppm (365 µg/m ³)	—
	3 Hour	—	—	0.5 ppm (1300 µg/m ³)
	1 Hour	0.25 ppm (655 µg/m ³)	—	—
Sulfates	24 Hour	25 µg/m ³	NO FEDERAL STANDARDS	
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)		
Visibility Reducing Particulates	8 Hour (10 AM to 6 PM, PST)	Sufficient amount to produce an extinction coefficient of 0.23/KM - visibility of ten miles or more due to particles when relative humidity is <70 %.		

Table Source: California Air Resources Board, 1999

ppm=parts per million

mg/m³=milligrams per cubic meter

µg/m³=micrograms per cubic meter

Table 3-3: SDAB Attainment Status by Pollutant

Pollutant	Averaging Time	California Standards	Federal Standards ¹
Ozone (O ₃)	1 Hour	Non-Attainment	Non-Attainment
	8 Hour	No State Standard	Unclassified/Attainment ²
Respirable Particulate Matter (PM ₁₀)	Annual Geometric Mean	Non-Attainment	No Federal Standard
	24 Hour	Non-Attainment	Unclassified/Attainment
	Annual Arithmetic Mean	No State Standard	Unclassified/Attainment
Fine Particulate Matter (PM _{2.5})	24 Hour	No State Standard	Unclassified
	Annual Arithmetic Mean		Unclassified
Carbon Monoxide (CO)	8 Hour	Attainment	Attainment
	1 Hour	Attainment	Attainment
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	No State Standard	Attainment
	1 Hour	Attainment	No Federal Standard
Lead	30 Day Average	Attainment	No Federal Standard
	Calendar Quarter	No State Standard	Attainment
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	No State Standard	Attainment
	24 Hour	Attainment	Attainment
	1 Hour	Attainment	No Federal Standard
Sulfates	24 Hour	Unclassified	No Federal Standard
Hydrogen Sulfide	1 Hour	Unclassified	No Federal Standard
Visibility Reducing Particulates	8 Hour (10 AM to 6 PM, PST)	Unclassified	No Federal Standard

Table Source: California Air Resources Board, 2000.

¹ Only Primary NAAQS¹ are used for classification purposes. As such, no classification has been designated for the 3-hour SO₂ Standard.

² San Diego County is currently classified as "Unclassified/attainment" for the Federal 8-hour O₃ NAAQS. However, the County may be re-designated as "non-attainment" in 2000.

Table 3-4: Criteria Pollutant Sources and Health Effects

Pollutant	Sources	Health Effects	Typical Controls
Ozone (O ₃)	Formed when reactive organic gases (ROG) and nitrogen oxides react in the presence of sunlight. ROG sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides.	Breathing difficulties, lung tissue damage, vegetation damage, damage to rubber and some plastics	Reduce motor vehicle reactive organic gas (ROG) and nitrogen oxide (NOx) emissions through emission standards, reformulated fuels, inspections programs, and reduced vehicle use. Limit ROG emissions from commercial operations and consumer products. Limit ROG and NOx emissions from industrial sources such as power plants and refineries.
Respirable Particulate Matter (PM ₁₀)	Road dust, windblown dust, agriculture and construction, fireplaces. Also formed from other pollutants (acid rain, NOx, SOx, organics). Incomplete combustion	Increased respiratory disease, lung damage, cancer, premature death, reduced visibility, surface soiling	Control dust sources, industrial particulate emissions, wood burning stoves and fireplaces. Reduce secondary pollutants that react to form PM ₁₀ . Conserve energy.
Fine Particulate Matter (PM _{2.5})	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning. Also formed from reaction of other pollutants.	Increases respiratory disease, lung damage, cancer, and premature death; reduced visibility; surface soiling	Reduce combustion emissions from motor vehicles, equipment, industries, and agricultural and residential burning. Precursor controls, like those for ozone, reduce fine particle formation in the atmosphere.
Carbon Monoxide (CO)	Any source that burns fuel such as automobiles, trucks, heavy construction and farming equipment, residential heating.	Chest pain in heart patients, headaches, reduced mental alertness	Control motor vehicle and industrial emissions. Use oxygenated gasoline during winter months. Conserve energy.
Nitrogen Dioxide (NO ₂)	See Carbon Monoxide	Lung irritation and damage. Reacts in the atmosphere to form ozone and acid rain	Control motor vehicle and industrial combustion emissions. Conserve energy.
Lead	Metal smelters, resource recovery, leaded gasoline, deterioration of lead paint	Learning disabilities, brain and kidney damage	Control metal smelters. No lead in gasoline or paint.
Sulfur Dioxide (SO ₂)	Coal or oil burning power plants and industries, refineries, diesel engines	Increases lung disease and breathing problems for asthmatics. Reacts in the atmosphere to form acid rain.	Reduce use of high sulfur fuels (e.g., use low sulfur reformulated diesel or natural gas). Conserve energy.
Sulfates	Produced by reaction in the air of SO ₂ (see SO ₂); a component of acid rain	Breathing difficulties, aggravates asthma, reduced visibility	See SO ₂
Hydrogen Sulfide	Geothermal power plants, petroleum production and refining, sewer gas	Nuisance odor (rotten egg smell), headache and breathing difficulties (higher concentrations)	Control emissions from geothermal power plants, petroleum production and refining, sewers, sewage treatment plants

Table Source: California Air Resources Board, 2000.

3.3 *Biological Resources*

3.3.1 Background

The analysis of impacts to biological resources focuses on off-reservation impacts due to road construction necessary to alleviate traffic from the existing and future casinos. The Jamul gaming facility, however, plans to develop on both reservation lands and County jurisdictional lands. County lands will be developed for non-gaming facilities and infrastructure, such as access roads, golf courses and parking lots. Analysis of this project has focused on all development that will occur on off-reservation lands that fall within County jurisdiction.

Expansion of existing facilities, creation of new ones, and the infrastructure improvements needed to support these facilities, will result in both direct and indirect impacts to biological resources. Direct impacts will occur with the removal of habitat. Indirect impacts, such as edge effects, will occur adjacent to development areas. Edge effects include increased lighting and noise in wildlife habitat areas, introduction of exotic plant species into native habitats and feral animals into wildlife habitat, loss of raptor foraging habitat, and the potential for increased human traffic. These types of impacts will occur whenever natural lands abut development. Edge effects may be significant as a majority of the proposed facilities and infrastructure occur adjacent to natural habitat.

The Barona, Jamul and the Sycuan reservations lie within the boundaries of the County's Multiple Species Conservation Plan (MSCP). The MSCP is a "comprehensive, long-term habitat conservation plan, which addresses the needs of multiple species and the preservation of natural vegetation communities in San Diego County." The MSCP addresses the potential impacts of urban growth, natural habitat loss and species endangerment and creates a plan to mitigate for the potential loss of covered species and their habitat due to the direct impacts of future development of both public and private lands within the MSCP area.

The MSCP is a subregional plan under the Natural Communities Conservation Program, which will be implemented through the local subarea plans. The County's Subarea Plan and its associated Implementing Agreement establish the conditions under which the County, for the benefit of itself and of public and private landowners and other land development project proponents within its Subarea boundaries, will receive from the U.S. Fish and Wildlife Service and the California Department of Fish and Game certain long-term Take Authorizations (and an acknowledgement that the MSCP satisfies conditions established in the Section 4(d) Special Rule for the coastal California gnatcatcher) which will allow the taking of certain covered species incidental to land development and other lawful land uses which are authorized by the County."

3.3.2 Analysis of Potential Impacts

3.3.2.1 Existing Facilities

Barona Gaming Facility

Project Level Impacts: The existing facility is entirely upon reservation lands, therefore the County has no jurisdiction over biological impacts that resulted from construction of the existing facility. The casino has had a significant effect on the traffic volumes of Wildcat Canyon Road, which may necessitate widening of the road. The expansion of the facility will further increase the traffic volume. A detailed discussion of potential biological impacts associated with widening of Wildcat Canyon Road follows in the Section 3.3.2.2., below.

Cumulative Impacts: Cumulative impacts would occur with respect to loss of sensitive habitats and species.

Sycuan Gaming Facility

Project Level Impacts: The existing facility is within reservation lands. The project is accessed via Dehesa Road and Sycuan Road. Significant biological impacts could occur if these roads need to be widened to accommodate increased traffic from the casino. Two sensitive habitat types occur along Dehesa and Sycuan Roads: Valley and Foothill Grasslands and Southern Coast Live Oak Riparian Forest. Both these habitats are considered extremely sensitive within San Diego County. The Sycuan reservation and the access roads (Dehesa Road and Sycuan Road) lie within the Metro-Lakeside-Jamul Segment of the County's MSCP. Based on a review of regional maps, staff can predict impacts to biological resources on land adjacent to Dehesa Road and Sycuan Road will be significant for the following reasons:

1. This area is located within a Pre-Approved Mitigation Area of the Metro-Lakeside-Jamul segment of the MSCP and is therefore, considered a Biological Resource Core Area (BRCA).
2. The majority of habitat along Dehesa Road and Sycuan Road has been identified as High and Very High Habitat Value on the MSCP Habitat Evaluation Map.
3. Numerous narrow endemic and critical species as identified by the MSCP are known to be present in this portion of the Subarea Plan.

Cumulative Impacts: Cumulative impacts would occur with respect to loss of sensitive habitats and species.

Viejas Gaming Facility

Project Level Impacts: The Viejas Casino is accessed by Willows Road, a two-lane road. Impacts to biological resources will be significant if this road is widened to accommodate the increased traffic from the casino. The lands west of the casino and adjacent to Willows Road support Southern Coast Live Oak Riparian Forest, a sensitive habitat within the

County. In addition, Los Posas soils are present along portions of the Willows Road alignment. Gabbro soils, such as the Los Posas series, are known to support a high number of sensitive plants.

Cumulative Impacts: Cumulative impacts would occur with respect to loss of sensitive habitats and species.

3.3.2.2 Proposed Facilities

Barona Gaming Facility Expansion

Project Level Impacts: Significant traffic impact would require extensive unspecified improvements to Wildcat Canyon Road in Lakeside. This area is within the County's Multiple Species Conservation Program. Based on a review of regional maps, historical documentation and staff familiarity with the Wildcat Canyon Road vicinity, staff can predict impacts to biological resources will be significant. The area adjacent to Wildcat Canyon Road between the Barona Reservation and Willow Road supports several sensitive habitats, including southern coast live oak riparian forest, coast live oak woodland, coastal sage scrub and southern mixed chaparral. Several threatened, endangered or otherwise sensitive plant and animal species are known to inhabit the area, including Arroyo Southwestern Toad, Southwestern Willow Flycatcher, Least Bell's Vireo, California Gnatcatcher, Golden Eagle, Lakeside ceanothus and Variegated dudleya. In addition, to directly impacting these sensitive habitats and species, road improvements to Wildcat Canyon Road may adversely affect the County's MSCP through the destruction/modification of a key wildlife corridor. Land adjacent to Wildcat Canyon Road is an important biological resource within the MSCP for the following reasons:

1. This area is located within a Pre-Approved Mitigation Area of the Metro-Lakeside-Jamul segment of the MSCP and is therefore, considered a Biological Resource Core Area (BRCA).
2. Impacts would occur to an area located at the northern terminus of the Lakeside Linkage, one of the primary linkages within the MSCP.
3. The majority of habitat along Wildcat Canyon Road has been identified as High and Very High Habitat Value on the MSCP Habitat Evaluation Map.
4. Numerous narrow endemic and critical species as identified by the MSCP are known to be present in the area.

Cumulative Impacts: Cumulative impacts would occur with respect to loss of sensitive habitats and species.

Jamul Gaming Facility

Project Level Impacts: Several parcels are involved the proposed casino project. The project will be developed in a highly sensitive region of the County for biological resources. Numerous threatened and endangered species are known to be present throughout Otay Mesa to the southwest and Jamul to the east. The proposed development site supports

Diegan coastal sage scrub and coast live oak woodland. Both of these vegetation types are considered sensitive due to the high potential for rare plants and animals to be present within the habitat. In addition, Los Posas soils are present over parts of the site and in the vicinity. Gabbro soils, such as the Los Posas series, are known to support a disproportionately high number of sensitive plants. Project development may result in significant impacts to sensitive species and habitats, including coastal sage scrub and its obligate species, wetland habitats and sensitive plant species.

A riparian corridor occurs on the eastern side of both the 10.34-acre parcel and the larger 86.03-acre parcel. This area continues south and bisects the reservation. A second riparian corridor begins at the southeastern edge of the 4-acre parcel and runs south. Both of these streams may be affected by the construction of the Jamul facilities and associated infrastructure. It appears that at a minimum, road crossings will be required to access the western portions of the 10.34-acre parcel and the 86.03-acre parcel. These impacts would be considered significant under CEQA, and potentially subject to both State and Federal regulations in addition to County regulations.

Staff is extremely concerned about the project's impacts on the MSCP. The northern 10-acre parcel and the 4.35 acre triangular parcel are within the Metro-Lakeside-Jamul segment of the County's Subarea Plan. Development within these areas must conform to specific criteria regarding project design and mitigation. The Biological Mitigation Ordinance dictates specific Findings that must be made and the appropriate mitigation for impacts for all development within the Metro-Lakeside-Jamul segment. In addition, a portion of the 4.35-acre parcel has previously been designated as "preserved" as mitigation for the Otay Ranch Project. Development within the preserved lands would be considered a significant impact and would not conform to the MSCP. If these lands are developed as part of the Jamul casino project, the Otay Ranch development must provide additional mitigation for project impacts.

The larger 86.03-acre parcel is within the South County Segment of the Subarea Plan. Land within the South County Segment was designated as preserved, limited development and developable when the MSCP was adopted. The location of various designated lands conformed to development projects being reviewed at that time, including the Otay Ranch Specific Plan. Figure 3-2 shows the location of the MSCP designated lands in relation to the proposed project site. Any variation to the current mapped MSCP plan may result in a negative impact in the regional preserve system.

A small portion of the lands shown as "Preserved Areas" on the 86.03-acre parcel were designated as "Limited Development" lands. The eastern edge of the preserve areas has this special designation. A total of 1,166 acres of Limited Development lands were included within the Otay Ranch Specific Plan. The configuration of "Limited Development" lands may be adjusted, however, at least 396 acres must be preserved within the entire Specific Plan. If the proposed casino project will develop within the "Limited Development" areas, then information must be provided addressing the impact to the preserve plan for Otay Ranch. Reducing the total preserved to less than 396 acres would be considered a significant impact to the County's MSCP.

Lands shown as "Developable" have already been evaluated as potential development. Direct take of the habitat and species within those areas was previously anticipated. However, proposed land uses must be compatible with the adjacent preserved areas in order to avoid indirect impacts. Thus, the County will need more information about the project before comprehensively evaluating impacts of the development.

Cumulative Impacts: Cumulative impacts could occur with respect to loss of sensitive habitats and species.

Pala Gaming Facility

Project Level Impacts: The Pala casino will be accessed by SR 76. The widening of SR 76 could result in significant impacts to coastal sage scrub and wetland habitats associated with the San Luis Rey River and Pala Creek. Species which could be impacted by the road widening are the Coastal California Gnatcatcher, a federally listed threatened species; the Coastal Cactus Wren, a California Species of Special Concern; the Orange-throated Whiptail, a California Species of Special Concern; the Arroyo Southwestern Toad, a federally listed endangered species, Least Bell's Vireo, a federally listed endangered species, and Golden Eagle, which is a California Species of Special Concern and is protected under the federal Bald and Golden Eagle Protection Act.

Cumulative Impacts: Cumulative impacts associated with this project include impacts to California Gnatcatcher, Coastal Cactus Wren, Orange-throated Whiptail and Arroyo Southwestern Toad (upland aestivation habitat) due to regional losses of coastal sage scrub habitat. Additional cumulative impacts will occur with respect to regional loss of breeding habitat for the Arroyo Southwestern Toad and habitat for the Least Bell's Vireo (wetlands).

Rincon Interim Gaming Facility

Project Level Impacts: The project can be accessed by both SR 76 and Valley Center Road. The widening of SR 76 could result in significant impacts to coastal sage scrub and wetland habitats associated with the San Luis Rey River and Pala Creek, as discussed above.

The widening of Valley Center Road is a current Capital Improvement Project for the Department of Public Works. This widening will occur regardless of the presence of a casino on the Rincon Reservation. Therefore, we cannot attribute biological impacts associated with the road widening to the development of the Rincon Casino.

Cumulative Impacts: Cumulative impacts associated with this project include impacts to California Gnatcatcher, Coastal Cactus Wren, Orange-throated Whiptail and Arroyo Southwestern Toad (upland aestivation habitat) due to regional losses of coastal sage scrub habitat. Additional cumulative impacts will occur with respect to regional loss of breeding habitat for the Arroyo Southwestern Toad and habitat for the Least Bell's Vireo (wetlands).

San Pasqual Interim Gaming Facility

The widening of Valley Center Road is a current Capital Improvement Project for the Department of Public Works. This widening is planned, and therefore, biological impacts

associated with the road widening can not be attributed solely to the development of the San Pasqual Casino.

3.3.2.3 Anticipated Facilities

Campo Gaming Facility

Project Level Impacts: There is not enough information regarding the potential gaming facility to identify specific impacts to biological resources. Impacts may occur to biological resources if SR 94 and Old Highway 80 are widened to address traffic issues.

Cumulative Impacts: Cumulative impacts could occur with respect to loss of sensitive habitats and species.

Ewiiapaayp Gaming Facility

Project Level Impacts: The Ewiiapaayp Reservation is located on Mt. Laguna southeast of the Laguna Observatory. Vegetation types in this area generally consist of coniferous forest, montane meadows and wetlands. Impacts to any of these habitats would be considered significant.

The Ewiiapaayp have also proposed an alternate site for the casino. The alternate site is located on Willows Road, west of the Viejas facility. A Native American health center is currently located on the parcel.

Cumulative Impacts: Cumulative impacts could occur with respect to loss of sensitive habitats and species.

La Jolla Gaming Facility

Project Level Impacts: The project can be accessed by both SR 76 and Valley Center Road. The widening of SR 76 could result in significant impacts to coastal sage scrub and wetland habitats associated with the San Luis Rey River and Pala Creek, as discussed above.

The widening of Valley Center Road is a current Capital Improvement Project for the Department of Public Works. This widening is planned, and therefore, the biological impacts associated with the road widening cannot be solely attributed to the development of the La Jolla Casino.

Cumulative Impacts: Cumulative impacts associated with this project include impacts to California Gnatcatcher, Coastal Cactus Wren, Orange-throated Whiptail and Arroyo Southwestern Toad (upland aestivation habitat) due to regional losses of coastal sage scrub habitat. Additional cumulative impacts will occur with respect to regional loss of breeding habitat for the Arroyo Southwestern Toad and habitat for the Least Bell's Vireo (wetlands).

Manzanita Gaming Facility

Project Level Impacts: There is not enough information regarding the potential gaming facility to identify specific impacts to biological resources. Impacts may occur to biological

resources if SR 94 and Old Highway 80 are widened to address traffic issues. Several sensitive plant and animal species are known to exist in the reservation area.

Cumulative Impacts: Cumulative impacts could occur with respect to loss of sensitive habitats and species.

Pauma Gaming Facility

Project Level Impacts: The widening of SR 76 could result in significant impacts to coastal sage scrub and wetland habitats associated with the San Luis Rey River and Pala Creek. Species which could be impacted by the road widening are the Coastal California Gnatcatcher, a federally listed threatened species; the Coastal Cactus Wren, a California Species of Special Concern; the Orange-throated Whiptail, a California Species of Special Concern; the Arroyo Southwestern Toad, a federally listed endangered species, Least Bell's Vireo, a federally listed endangered species, and Golden Eagle, which is a California Species of Special Concern and is protected under the federal Bald and Golden Eagle Protection Act.

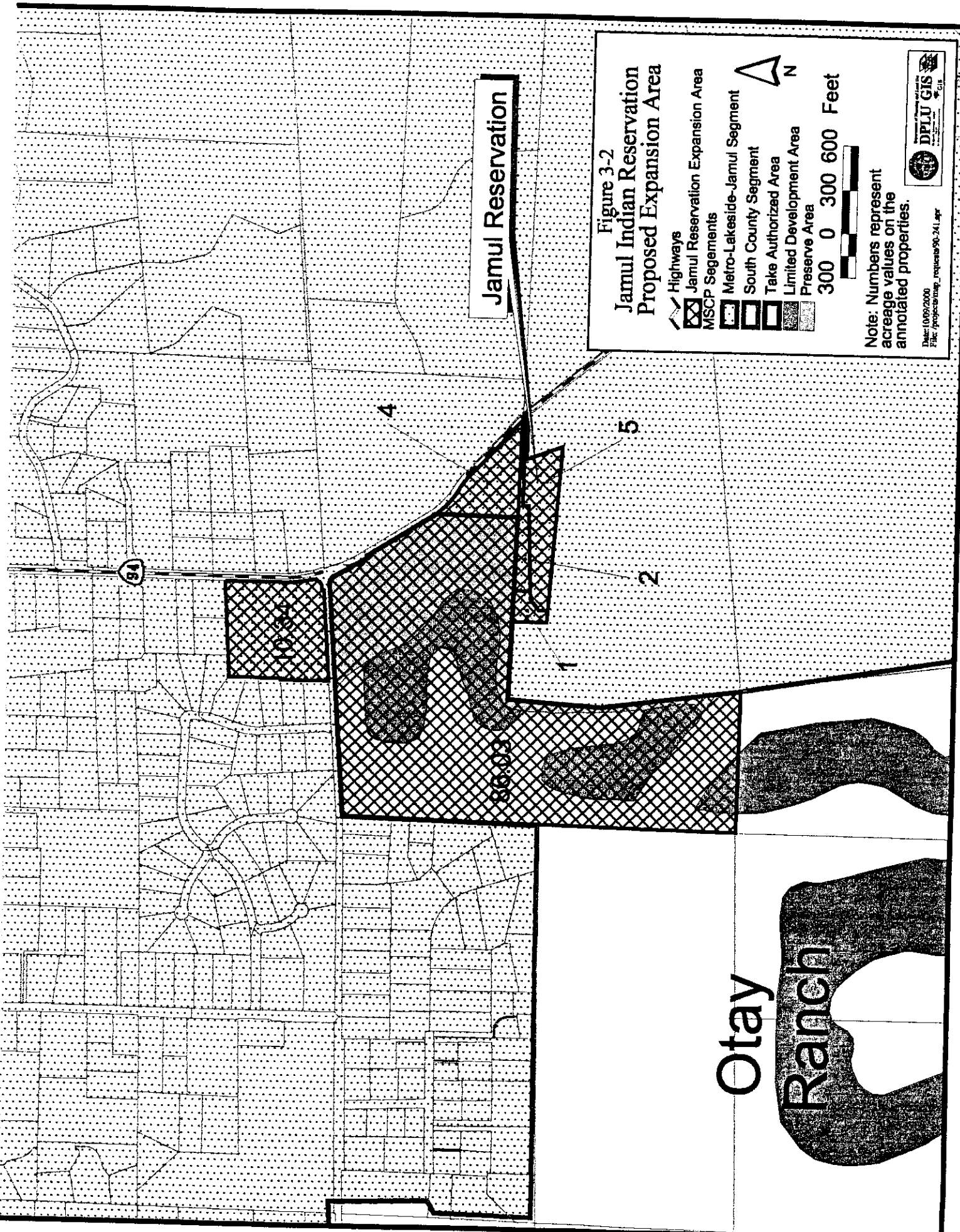
Cumulative Impacts: Cumulative impacts associated with this project include impacts to California Gnatcatcher, Coastal Cactus Wren, Orange-throated Whiptail and Arroyo Southwestern Toad (upland aestivation habitat) due to regional losses of coastal sage scrub habitat. Additional cumulative impacts will occur with respect to regional loss of breeding habitat for the Arroyo Southwestern Toad and habitat for the Least Bell's Vireo (wetlands).

3.3.3 Conclusions and Recommendations

Significant impacts to biological resources located within County jurisdiction may occur, including potential impacts to species protected under the Federal Endangered Species Act. In addition, significant impacts may occur within the lands covered under the County's MSCP. Cumulative impacts to biological resources as a result of widening of roadways to handle flow of traffic to/from the gaming facilities are likely to be significant.

Based on the identified areas of concern, staff recommends the following:

- 3-11 The County should encourage the Tribes to assist in the preparation of full biological surveys and reports in order to determine the extent of biological impacts which will occur where traffic analyses shows that road widening will be required to compensate for the increased traffic on access roads, including SR 94, Old Highway 80, SR 76, and Sunrise Highway. When significant impacts are identified, these reports should adequately address mitigation measures for each impact.
- 3-12 To account for impacts from associated support facilities located off-reservation, on fee lands within County jurisdiction, comprehensive biological surveys and reports should be prepared according to the County's Biological Survey Guidelines. Where land falls within the County's MSCP, a detailed analysis of uses proposed within each type of MSCP designated area and how development will conform to the overall MSCP plan should be required.



Jamul Reservation

Figure 3-2
Jamul Indian Reservation
Proposed Expansion Area

Highways
 Jamul Reservation Expansion Area MSCP Segements
 Metro-Lakeside-Jamul Segment
 South County Segment
 Take Authorized Area
 Limited Development Area
 Preserve Area

N

300 0 300 600 Feet

Note: Numbers represent acreage values on the annotated properties.

Date: 10/09/2000
File: projectmap_requests90-741.apr

DPLU GIS

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3.4 Community Character, Visual Resources, and General Plan 2020

3.4.1 Background

The overall qualitative perception of a community, a sense of uniqueness or “sense of place”, defines the community character of an area. It is based on a sense of space and boundaries, physical characteristics (geographical setting, presence of unique natural and man-made features, ambient noise, air quality) and qualitative psychological responses (“rural”, “friendly”). The visual or aesthetic environment is an essential component of community character.

Each community and subregional planning area in San Diego County identifies community character attributes common to their areas, and outlines goals and policies in their respective General Plan texts and maps that are intended to preserve those attributes. These goals and policies are implemented through land use, zoning and through other regulatory ordinances. Additionally, some of the communities impacted by Indian gaming facilities have adopted design guidelines to improve the aesthetics of development. Development on Reservations can greatly affect the visual quality and community character of a community.

3.4.2 Analysis of Potential Impacts

Information provided to the County about the individual proposals has been limited and staff has not been able to complete a thorough review of the development and operations of the gaming facilities. Therefore, the following analysis of impacts is based on the limited information available to the County.

3.4.2.1 General Plan 2020

According to State law, each city and county is required to adopt a general plan that serves as a basis for decisions regarding the jurisdiction’s long-term physical development. The general plan identifies development goals, and expresses public policy related to the distribution of future land uses, both public and private. A general plan also sets the density and intensity of land uses, typically over a 20-year period. This includes residential, commercial, industrial, agricultural, open space, and other land uses.

The County of San Diego is in the process of preparing a comprehensive update of its General Plan, a project known as General Plan 2020. General Plan 2020 is a multi-year project that will establish future growth and development patterns for the unincorporated area of the County. General Plan 2020 will form a framework into which unincorporated communities will grow, shaping the future of San Diego County. The end product will be a document that protects the environment, accommodates population growth, and links that growth to the provision of required facilities and services.

Currently, staff of the Department of Planning and Land Use is moving forward with recommendations for Regional Goals and Policies, Density Categories, Standards and a Glossary of Terms. The Planning Commission endorsed these recommendations on September 29, 2000, and the Board of Supervisors will consider the recommendations on

November 15, 2000. Next, the Planning Commission will consider the land use pattern distribution, known as Alternative III, on November 13 and 27, 2000. In addition, throughout the month of October, staff of the Department of Planning and Land Use is attending the meetings of all the County Planning and Sponsor Groups to present General Plan 2020 and explain the process, receive input on Alternative III and answer questions.

The existing and proposed gaming facilities throughout the County are located on Indian Reservations that are not subject to the San Diego County General Plan. Revisions and changes made in General Plan 2020 will not apply to the Indian Reservations. Yet, because of the proximity of County lands to the Reservations, General Plan 2020 and the resulting land uses will nonetheless have an impact on the Reservation lands and the residents of the Reservations.

In the General Plan 2020 process, recommendations on future land use designations and Circulation Element road classifications, as well as intensity and density of future development, will be made based on population projections and existing land uses, including existing gaming facilities. An analysis of the population projections and existing land uses may show a change in the need for housing, commercial land or a Circulation Element road classification. The specific location of any proposed land use designation or Circulation Element road classification will be based on the need for each type of land use, logical land use patterns and environmental constraints, such as terrain, accessibility, infrastructure and availability of public services. The presence of the gaming facilities will be considered but will not necessarily lead to changes in land use designations in the areas surrounding the facilities. For example, the presence of a gaming facility, which is an intense land use, does not necessarily mean that the adjacent lands will be planned for more intense land uses, such as commercial or higher density residential.

One area of General Plan 2020 where the presence of gaming facilities will be especially considered is in transportation planning. An analysis of projected traffic volumes on County roads will be completed based on development of County lands and will include existing gaming facilities. An additional analysis will be completed adding in the projected traffic volumes on County roads from proposed gaming facilities. This will allow the County to determine what, if any, revisions should be made to the Circulation Element of the General Plan to plan for future traffic volumes on County roads generated by gaming facilities. In some cases, the need to accommodate traffic will override the desire to maintain the rural community character and road improvements will be constructed. Each situation must be analyzed individually and alternative considered before a decision is made.

3.4.2.2 Individual Projects

Barona Gaming Facility

The Barona gaming facility is located east of Wildcat Canyon Road, six miles north of the State Route 67/Mapleview Street intersection in Lakeside. Because the gaming facility is completely surrounded by the Barona Reservation, it does not abut lands under County jurisdiction. Therefore it does not directly impact the visual quality and community character of adjacent lands under County jurisdiction. Likewise, the Barona expansion

project is completely surrounded by the Barona Reservation and does not directly impact the visual quality and community character of adjacent lands under County jurisdiction.

However, the roads used to access the gaming facility are located within and adjacent to lands under County jurisdiction. The impacts to County lands adjacent to these roads is discussed below. These roads include Wildcat Canyon Road, Mapleview Street and Willows Road to the south toward Lakeside and Wildcat Canyon Road and San Vicente Road to the north toward Ramona.

Any expansion of the gaming facility is expected to result in an increase in traffic on Wildcat Canyon Road and other roads leading to Wildcat Canyon Road, the only access to the gaming facility. The increase in traffic and the resulting increase in noise are expected to contribute to an even greater change in the rural character of the land near these roads.

Wildcat Canyon Road is a winding, primarily two-lane road that climbs and descends from the Barona Mesa through a scenic, rural area with estate residences and agriculture on large lots scattered among oak trees, boulders and native vegetation. The road passes through or near three County parks that contribute to the rural atmosphere, Louis A. Stelzer County Park, El Capitan County Open Space Preserve and Oak Oasis County Open Space Preserve. Currently, the General Plan Land Use Designations of land adjacent to Wildcat Canyon Road include (17) Estate, (18) Multiple Rural Use and (24) Impact Sensitive. Minimum lot sizes range from 2 to 20 acres.

Both the Ramona and Lakeside Community Plan texts of the General Plan identify their communities as rural and have the stated intent of maintaining the rural atmosphere of the Planning Areas. Both Plan texts identify a goal of meeting present and future circulation needs with a balanced transportation system while not negatively impacting the rural character of each community.

The presence of the gaming facility has resulted in an increase of traffic on Wildcat Canyon Road. Traffic has also increased on roads in Lakeside that lead into Wildcat Canyon Road, including Mapleview Street and Willow Road and on roads in Ramona, such as San Vicente Road. This increase in traffic and the resulting increase in noise have contributed to a change in the rural character of the land near these roads.

The increase in traffic volume on these County roads will lead to a need to improve and widen these roads if a minimum Level of Service D is to be maintained. Assuming the roads will be widened and become more urban in appearance, they will detract from the visual quality and would negatively impact the rural community character of the surrounding lands.

In summary, the rural community character and visual quality of the lands adjacent to the roads leading to the Barona gaming facility has been changed due to the increase in traffic and noise. The visual quality and rural community character could be further affected if the roads are improved to accommodate the increase in traffic from the gaming facility.

Sycuan Gaming Facility

The Sycuan gaming facility is located on Sycuan Road, approximately ¼ mile south of Dehesa Road in the community of Dehesa. The facility is sited on the northern boundary of the Sycuan Reservation and is adjacent to property and uses under County jurisdiction within the Crest/Dehesa/Harbison Canyon/Granite Hills Subregional Plan Area. Land to the east and north of the Reservation has General Plan Land Use Designations of (17) Estate and (24) Impact Sensitive, allowing lot sizes ranging from 2 to 20 acres. Land to the east has a (18) Multiple Rural Use Land Use Designation and allows lot sizes ranging from 4 to 20 acres. The Conrock/Fenton Specific Plan Area is located to the south and southwest of the Reservation. This approved Specific Plan allows extraction of the aggregate sand resources of the Sweetwater River.

The Crest/Dehesa/Harbison Canyon/Granite Hills Subregional Plan text identifies the Dehesa Valley as a picturesque, pastoral, agricultural area located along the upper reaches of the North Fork of the Sweetwater River and along the lower portions of Harbison Canyon Creek. Dehesa is primarily agricultural and large-lot residential. Although many agricultural uses have disappeared from the Dehesa Valley, its distinctive rural character remains. The Plan text also includes policies and recommendations to maintain the pastoral-rancho style of living by encouraging outdoor activities such as small-scale farming, animal husbandry and horseback riding.

The existing uses and development at the Sycuan gaming facility represent a land use pattern that is not compatible with the surrounding lands under County jurisdiction. The size, design and operating characteristics of the gaming facility and associated uses are much more intense than the surrounding rural residential and agricultural land uses. The generation of traffic, noise and lighting on surrounding land all have contributed to a change in the rural character of these lands.

The increase in traffic volume on the County roads leading to the gaming facility will lead to a need to improve and widen these roads if a minimum Level of Service D is to be maintained. Assuming the roads are widened and become more urban in appearance, they will detract from the visual quality and would negatively impact the rural community character of the surrounding lands. The current Plan text acknowledges the presence of the Sycuan gaming facility and, in order to maintain the community character, includes a policy and recommendation that the Federal government become active in helping mitigate some of the adverse traffic impacts generated by the facility.

In summary, the visual quality and community character of the lands adjacent to the gaming facility and the roads leading to the facility have been changed due to the presence of the facility and the fact that gaming facilities and rural residential and agricultural land uses are not compatible.

Viejas Gaming Facility

The Viejas gaming facility is located on the north side of Interstate 8, approximately five miles east of the commercial center of the community of Alpine. The gaming facility is sited at the southern boundary of the Viejas Reservation and is proximate to property and

uses under County jurisdiction. Lands to the west, north and east of the Viejas Reservation are within the Cleveland National Forest and have a General Plan Land Use Designation of (23) National Forests and State Parks. Land to the south of the Viejas Reservation, south of Willows Road, is privately owned and has a General Plan Land Use Designation of (18) Multiple Rural Use, which allows lots sizes of 4, 8, or 20 acres depending on slope. The land surrounding the reservation and gaming facility is rural with many undeveloped areas. The developed land is generally occupied by agricultural and estate residential uses on large lots.

The current Alpine Community Plan text of the General Plan identifies Alpine as a rural community and has the stated intent of maintaining the rural atmosphere of the Planning Area. The current Plan text also states that the community character of Alpine will best be maintained by a gradual decrease in density from the Country Town and centralized industrial and commercial area. It is the stated intent of the Plan text to keep residential and agricultural areas of Alpine free from industrial and major commercial encroachments.

The existing uses and development at the Viejas gaming facility represent a land use pattern that is not compatible with the surrounding lands under County jurisdiction. The size, design and operating characteristics of the gaming facility and associated uses, including a retail center and outdoor concert venue, are much more intense than the surrounding rural residential land uses. The generation of traffic, noise and lighting on surrounding land all have contributed to a change in the rural character of these lands.

The pattern of development of the gaming facility does not contribute to the desired community character of the surrounding areas. The development pattern is not in keeping with the intent of the Alpine Community Plan text to gradually decrease density from the centralized industrial and commercial core and to keep the residential and agricultural areas free from industrial and major commercial encroachments.

The segment of Interstate 8 with east and west views of Viejas Mountain, located west of the gaming facility, has been identified in the General Plan as a Scenic View Corridor. The Alpine Community Plan text recommends preserving this vista. Views from Interstate 8, also identified as a Second Priority Scenic Highway in the General Plan, and views from the surrounding private lands have changed and now include a more urban-type development that contrasts with the surrounding natural and rural areas.

In summary, the visual quality and community character of the lands adjacent to the gaming facility have been changed due to the presence of the facility and the fact that gaming facilities and rural residential/agricultural land uses are generally not compatible.

Jamul Gaming Facility

The proposed Jamul gaming facility is located on the west side of State Route 94, north and south of Melody Lane. Most of the parcels identified for the project are under County jurisdiction within the Jamul-Dulzura Subregional Plan Area. A five-acre portion of the project site is within a Reservation. A portion of the site under County jurisdiction is within the Otay Ranch Specific Plan Area and has a General Plan Land Use Designation of (21) Specific Plan Area. Allowable land uses in the Otay Ranch Specific Plan, include open

space and low-density residential development (0-3 dwelling units per acre). The remaining portions of the project site and surrounding areas have General Plan Land Use Designations of (1) Residential and (17) Estate, allowing agricultural and low-density residential uses on lot sizes ranging from 1 to 4 acres.

Existing development to the north generally consists of single-family residences on large lots. Most of the land to the south, east and west is undeveloped and supports native vegetation with some areas of agriculture. The Jamul community as a whole is considered rural with limited and concentrated commercial development.

The Jamul-Dulzura Subregional Plan includes land use goals to encourage development of land in a manner as to retain the existing rural atmosphere of the community. The land use goals also intend to direct commercial land uses to areas within the Country Town boundary and Urban Limit Line.

The proposal to develop a casino and hotel with associated parking, lighting and utility systems represents a land use pattern that is not compatible with the surrounding lands under County jurisdiction. The size, design and operating characteristics of the gaming facility and associated uses are much more intense than the surrounding rural residential land uses. The generation of traffic, noise and lighting from a facility that will likely operate 24 hours a day, 7 days a week, on surrounding land all will contribute to a change in the rural character of these lands.

To access the gaming facility, patrons will have to travel primarily on State Route 94. State Route 94 is adjacent to lands under County jurisdiction. The increase in traffic volume and noise on State Route 94 will contribute to a change in the rural character of the land near this road.

The increase in traffic volume on State Route 94, which is mainly a winding two-lane road, will also lead to a need to improve and widen this road if a Level of Service D is to be maintained. Assuming State Route 94 is widened and becomes more urban in appearance, the improvements will detract from the visual quality and would negatively impact the rural community character of the surrounding lands.

In summary, the rural community character and visual qualities of the lands adjacent to the gaming facility and adjacent to State Route 94 will be changed. The changes adjacent to the gaming facility will be due to the fact that gaming facilities and rural residential/agricultural land uses are generally not compatible. The changes adjacent to the road will be due to the increase in traffic and noise, and potential road widening that will detract from the rural community character.

Pala Gaming Facility

The proposed Pala gaming facility is located on the south side of State Route 76, near the intersection with County Highway S-16, also known as Pala-Temecula Road, five miles east of Interstate 15. The facility is sited near the western boundary of the Pala Reservation and is within several hundred feet of property and uses under County jurisdiction within the Pala/Pauma Subregional Plan Area. Land to the west and northwest has General Plan Land

Use Designations of (19) Intensive Agriculture, (20) Agricultural Preserve and (24) Impact Sensitive, which allow lot sizes ranging from 2 to 40 acres.

The areas near the Reservation under County jurisdiction are rural and consist of undeveloped areas of native vegetation, agriculture and large-lot residential uses. State Route 76 is located north of and parallels the course of the San Luis Rey River, which runs to the ocean west toward Interstate 15. The Pala-Pauma Subregional Plan text acknowledges the importance of agriculture within the Plan area and includes policies to limit the intrusion of incompatible land uses into existing agricultural areas. Additional policies set goals of providing commercially designated land without affecting the scenic, rural character of the community and to limit strip commercial development along State Route 76.

The proposed development and uses represent a land use pattern that is not compatible with the surrounding lands under County jurisdiction. The size, design and operating characteristics of the gaming facility and associated uses, including outdoor entertainment facilities, are much more intense than the surrounding rural residential land uses. The generation of traffic, noise and lighting on surrounding land all contribute to a change in the rural character of these lands.

The pattern of development of the gaming facility does not contribute to the desired community character of the surrounding areas. The development pattern is not in keeping with the intent of the Pala-Pauma Subregional Plan text to limit the intrusion of incompatible land uses into the existing agricultural areas near the facility. Although the development provides additional commercial land, it does not do so without affecting the scenic, rural character of the community. In addition, the commercial use is sited parallel and not perpendicular to State Route 76, as is called for in the Plan text.

To access the gaming facility, patrons will have to travel primarily on State Route 76. State Route 76 is not a County road, but is adjacent to lands under County jurisdiction. The increase in traffic volume and the resulting noise increase on State Route 76 will contribute to a change in the rural character of the land near this road.

The increase in traffic volume on State Route 76, which is mainly a winding two-lane road, will lead to a need to improve and widen this road is a Level of Service D is to be maintained. Assuming State Route 76 is widened and becomes more urban in appearance, the improvements will detract from the visual quality and would negatively impact the rural community character of the surrounding lands.

In summary, the rural community character and visual qualities of the lands adjacent to the gaming facility and adjacent to the roads leading to the facility will be changed. The changes adjacent to the gaming facility will be due to the fact that gaming facilities and rural residential and agricultural land uses are generally not compatible. The changes adjacent to the roads will be due to the increase in traffic and noise, and potential road widening that will detract from the rural community character.

Rincon Temporary Gaming Facility

The temporary Rincon gaming facility is located on the west side of Valley Center Road, south of State Route 76. The facility is completely surrounded by the Rincon Reservation, with lands under County jurisdiction located to the east, west and north. The land under County jurisdiction near the facility is within the Pala-Pauma Subregional Plan area and has General Plan Land Use Designations of (17) Estate, (18) Multiple Rural Use and (24) Impact Sensitive. These Designations allow lots sizes ranging from 2 to 20 acres.

The areas near the Reservation under County jurisdiction are rural and consist of undeveloped areas of native vegetation, agriculture and large-lot residential uses. The gaming facility is located in a flat valley on land adjacent to and within the floodplain of the San Luis Rey River. The surrounding areas consist of steeply sloping hills to the west, south and east, with the Pauma Valley to the north.

The current Pala-Pauma Subregional Plan text acknowledges the importance of agriculture within the Plan area and includes policies to limit the intrusion of incompatible land uses into existing agricultural areas. Additional policies set goals of providing commercially designated land without affecting the scenic, rural character of the community.

The proposed development and uses represent a land use pattern that is not compatible with the surrounding lands under County jurisdiction. The size, design and operating characteristics of the gaming facility and associated uses are much more intense than the surrounding rural residential land uses. The generation of traffic, noise and lighting on surrounding land all will contribute to a change in the rural character of these lands.

The pattern of development of the gaming facility does not contribute to the desired community character of the surrounding areas. The development pattern is not in keeping with the intent of the Pala-Pauma Subregional Plan text to limit the intrusion of incompatible land uses into the existing agricultural areas near the facility. Although the development provides additional commercial land, it does not do so without affecting the scenic, rural character of the community.

To access the gaming facility, patrons will have to travel on State Route 76 and Valley Center Road. State Route 76 is not a County road, but is adjacent to lands under County jurisdiction. Valley Center Road is a County road and it passes through land under County jurisdiction to the south of the Rincon Reservation. The increase in traffic volume and the resulting noise increase on State Route 76 and Valley Center Road will contribute to a change in the rural character of the land near this road.

The increase in traffic volume on State Route 76 and Valley Center Road, which are mainly winding two-lane roads, will lead to a need to improve and widen these roads if a Level of Service D is to be maintained. Assuming State Route 76 and Valley Center Road are widened and become more urban in appearance, the improvements will detract from the visual quality and would negatively impact the rural community character of the surrounding lands.

In summary, the rural community character and visual qualities of the lands adjacent to the gaming facility and adjacent to the roads leading to the facility will be changed. The

changes adjacent to the gaming facility will be due to the fact that gaming facilities and rural residential and agricultural land uses are generally not compatible. The changes adjacent to the roads will be due to the increase in traffic and noise, and potential road widening that will detract from the rural community character.

San Pasqual Temporary Gaming Facility

The temporary San Pasqual gaming facility is located on the west side of North Lake Wohlford Road, north of Woods Valley Road and south of Valley Center Road. The San Pasqual Reservation is adjacent to property and uses under County jurisdiction within the Valley Center Community Plan area. The specific location of the gaming facility is not adequately identified in the EA prepared by the Tribe. For this reason, it is not possible to precisely identify adjacent land uses and proximity to land under County jurisdiction.

In general, land under County jurisdiction to the south, west and north of the Reservation has a General Plan Land Use Designation of (17) Estate, allowing lot sizes of 2 or 4 acres. County land to the east and southeast has a General Plan Land Use Designation of (19) Intensive Agriculture, allowing lot sizes of 2, 4 or 8 acres. The land surrounding the Reservation is rural with many undeveloped areas. The developed land is generally occupied by agricultural and estate residential uses on large lots.

The current Valley Center Community Plan text of the General Plan identifies Valley Center as a rural community and has a stated intent of maintaining the rural atmosphere of the Planning Area. The Plan text acknowledges that land use, lots sizes and the visual aspects of development have a considerable influence on the rural characteristics of the community.

The Plan text also states that the community character of Valley Center will best be maintained by a decrease in density from the Country Towns outward to the exterior limits of the planning area. It is the stated intent of the Plan text to keep low-density residential and agricultural areas of Valley Center free from industrial and major commercial encroachments.

The proposed development and uses represent a land use pattern that is not compatible with the surrounding lands under County jurisdiction. The size, design and operating characteristics of the gaming facility and associated uses are much more intense than the surrounding rural residential land uses. The generation of traffic, noise and lighting on surrounding land all contribute to a change in the rural character of these lands.

To access the gaming facility, patrons will have to travel on County roads such as Valley Center Road, Woods Valley Road and Lake Wohlford Road. The increase in traffic volume and the resulting noise increase on County roads leading to the Reservation and gaming facility will contribute to a change in the rural character of the land near these roads. Additionally, the increase in traffic volume on these County roads will lead to a need to improve and widen these roads if a Level of Service D is to be maintained. Assuming the roads are widened and become more urban in appearance, they will detract from the visual quality and would negatively impact the rural community character of the surrounding lands.

In summary, the rural community character and visual qualities of the lands adjacent to the gaming facility and adjacent to the roads leading to the facility will be changed. The changes adjacent to the gaming facility will be due to the fact that gaming facilities and rural residential/agricultural land uses are generally not compatible. The changes adjacent to the roads will be due to the increase in traffic and noise, and potential road widening that will detract from the rural community character.

3.4.2.3 Anticipated Gaming Facilities

Gaming facilities may be located on Reservations of Tribes that have signed gaming compacts but have not put specific development proposals forward. These Reservations include the Campo, Ewiiapaayp, La Jolla, Manzanita and Pauma Indian Reservations. Also anticipated is the permanent facility on the San Pasqual Reservation. The Campo, Ewiiapaayp and Manzanita Reservations are located in the southeastern portion of the County, while the La Jolla and Pauma Reservations are located in north central portion of the County, near State Route 76. The San Pasqual Reservation is located near Valley Center and Lake Wohlford. All six Reservations are located in rural areas with limited commercial development and large lot residential and agricultural uses. Public services are limited and access is typically via winding rural roads and highways.

As with the existing and proposed gaming facilities, the anticipated gaming facilities will introduce a scale and intensity of use that do not currently exist in the surrounding areas and represent a land use pattern that is not compatible with existing uses on nearby land under County jurisdiction. Increases in traffic volumes will be expected to impact the rural character of County roads and lands adjacent to these roads. Road improvements required to maintain a Level of Service D would impact the rural character of these areas.

3.4.2.4 Cumulative Impacts

The existing, proposed, and anticipated gaming facilities are scattered throughout the County. Other than the Viejas and Ewiiapaayp facilities discussed below, no gaming facilities are or will be located so close to another that more than one will be visible from any location. Therefore, there will not be cumulative visual impacts from gaming facilities on nearby land under County jurisdiction.

Viejas and Ewiiapaayp

Cumulative community character and visual impacts may occur if an additional gaming facility is constructed near the existing Viejas gaming facility in Alpine. Both gaming facilities would be located adjacent to land within the Alpine Community Planning Area and along the same road, Willows Road. The County lands in this area are rural with many undeveloped areas and are proximate to the Cleveland National Forest. The developed land is generally occupied by agricultural and estate residential uses on large lots.

The concentration of development with an urban-scale and appearance will lead to a change in the overall character and visual qualities of the lands along Willows Road. Because of the proximity of the gaming facilities to each other, both may be visible from properties on nearby County land. In addition, because each facility will contribute similar impacts leading to a change in the rural community character, these facilities will have a cumulative

effect on the overall rural character of these lands. The cumulative increase in traffic and associated noise along this rural road would also lead to change in its rural character.

Pala, Pauma, La Jolla and Rincon

Cumulative community character impacts may occur in the area along State Route 76, where at least four gaming facilities may be located. All four facilities would be located adjacent to land within the Pala-Pauma Subregional Plan Area and within the valleys formed by the San Luis Rey River. This area is very rural and is dominated by agricultural uses, steep topography and low-density residential uses. Commercial uses are few, and where they do occur they are of a small scale.

The concentration of development with an urban-scale and appearance will lead to a change in the overall character of the lands along State Route 76. Because each facility will contribute similar impacts leading to a change in the rural community character, these facilities will have a cumulative effect on the overall rural character of the lands along State Route 76. The cumulative increase in traffic and associated noise along this rural highway could also lead to change in its rural character.

3.4.3 Conclusions and Recommendations

In order for the County to thoroughly review and understand the planning, visual and community character impacts of the gaming facilities, the Tribes must provide additional and more specific information. The needed information includes vicinity and location maps to allow the County to locate the facilities in relation to Reservation boundaries and County lands; information on design, architectural details, lighting, signage and landscaping; grading plans; photographs of surrounding areas and an indication of the visibility of the proposed facilities from the surrounding areas; and information on accessory and supporting facilities, such as sewer treatment plants and water storage tanks.

In order to insure that General Plan 2020 adequately plans for traffic volumes on County roads, it is recommended that the County and Tribes participate in the General Plan 2020 process and on proposed gaming facilities and expansions of existing gaming facilities. Additionally, methods of identifying and mitigating impacts on a fairshare basis need to be identified.

As such, the staff makes the following recommendations:

- 3-13 The County should work with the Tribes in developing adequate exchange of information regarding facility design details, so that minimal impact to community character and other planning issues will take place.
- 3-14 The County should encourage the Tribes to design their facilities in a manner consistent with the Community Design Guidelines for their area.
- 3-15 The County should encourage the Tribes to become involved in the County's General Plan 2020 process, so that the Tribes interests may be adequately considered during the planning process.

3.5 Cultural Resources

3.5.1 Background

San Diego County contains a rich and important record of past human activities in the form of cultural resources that include thousands of archaeological sites, landscapes, sacred places, and historic properties. These cultural resources exist throughout the County. Many of these cultural resources, the oldest of which date back more than 9,000 years, are ancestral sites of the Native Americans currently living in San Diego County. The indigenous Indian peoples of San Diego include the Kumeyaay, the Cahuilla, the Luiseño, and Cupeño. The Kumeyaay live on several reservations located throughout central, southern, and eastern San Diego County. The Cahuilla live on and around Los Coyotes Reservation, located in the mountainous northeast part of the County. The Luiseño live on and around several reservations located in the northwestern part of the County. The Cupeño originally lived in an area near Warner Springs in the eastern part of the County, but were forcibly removed from their territory in the early 1900's and resettled at the Luiseño Pala reservation, where they still live today and maintain their cultural identity.

The conservation Element of the General Plan includes several policies that emphasize the importance of the conservation and protection of significant cultural resources (see policies X92-X94). In addition, there are a wide variety of federal (National Historic Preservation Act, Native American Graves Protection and Repatriation Act), state (California Environmental Quality Act), and local (Resource Protection Act) regulations and ordinances that implement cultural resource conservation policies. These policies, laws, and regulations are of central importance in defining the process that must be followed to identify and mitigate impacts to cultural resources from the establishment and expansion of tribal gaming facilities in San Diego County.

The following is a brief cultural history that describes the major periods of human occupation in San Diego County:

San Dieguito Complex/Paleo-Indian (9,400-8000 years before present)

The earliest archaeological evidence of Native American occupation in San Diego County consists of archaeological sites that belong to the San Dieguito Complex. Wide-ranging hunter-gatherers occupied these sites, including the famous Harris Site Complex along the San Dieguito River. These hunter-gatherer Indian groups subsisted on a combination of coastal and inland resources, including plants, animals, shellfish, and fish. Typical artifacts include flaked stone scrapers, bifacial knives, crescentics, and large projectile points.

La Jolla and Pauma Complexes/Archaic Horizon (8,000-1,300 years before present)

Along the coast, this period of Native American occupation is characterized by large shell midden sites characteristic of the La Jolla Complex. In addition to the massive quantities of marine shell, these sites include characteristic artifacts, such as flaked stone scrapers, flake tools, and large quantities of grinding stones (i.e. manos and metates). Flexed human burials are also characteristic of the La Jolla Complex. The people who occupied these coastal sites subsisted on the collection of shellfish, near shore fishing, and the collection of hard seeds,

which were processed using the grinding stones. During this time period, there was an inland occupation referred to as the Pauma Complex. Sites of the Pauma Complex lack shellfish, but include large quantities of grinding tools, and a wider variety of flaked stone tools. This inland manifestation represents a broad subsistence pattern and a more sedentary lifestyle, in comparison to the earlier San Dieguito Complex. There is considerable debate as to whether the La Jolla and Pauma Complexes represent different groups of people, a shift over time from a focus on coastal to inland resources, or two components of a single broad subsistence pattern.

Late Prehistoric (1,300 years ago – European Contact)

About 1000 years ago, there was a significant change in the archaeological record of San Diego. This includes the appearance in the archaeological record of pottery, small stone arrow points, bedrock stone mortars, and the practice of cremation. This change marks the appearance of traits that are characteristic of the Kumeyaay Indians that inhabited San Diego County at the time of European contact. The ancestors of the Luiseño, Cahuilla, and Cupeño Indians were also present in San Diego County during the Late Prehistoric Period. Although ethnographically and linguistically distinct from the Kumeyaay, the late prehistoric archaeological record of these groups is similar and represents broadly similar subsistence practices. There is continued debate concerning the relationship of the late prehistoric Kumeyaay Indians to earlier inhabitants of San Diego County, but it is likely that there is continuity with earlier populations. The prehistoric Kumeyaay were a hunting and gathering people who relied on acorns as a staple food, and hunted and collected a wide range of maritime and terrestrial resources. Their settlements included base camps at lower elevations and smaller settlements at higher elevations that were occupied seasonally when resources became available. This period is also characterized by an increase in exchange, including the widespread use of obsidian from the Obsidian Butte source located in the Salton Sea area.

Spanish Period (A.D. 1769-1821)

This period began with exploration and continued with the establishment of the Mission San Diego, the Presidio, and the Mission San Luis Rey. This period saw the introduction of cattle, horses, new agricultural crops, and new forms of architecture. European diseases were also introduced during this period and had a devastating effect on local populations. A significant focus of this period was the attempted conversion of local Indian populations to Catholicism.

Mexican Period (1821-1848)

After Mexican independence from Spain, Spanish laws and practices were maintained until the Mission San Diego was secularized in 1834. The period is characterized by large land grants where the primary activity was cattle ranching. The Pueblo of San Diego was established early in this period, the heart of which is Old Town. After secularization, Indians were to get half of the Mission lands, but only for use in raising crops. Some received lots, but soon lost them. Many Indians essentially became serfs who worked lands they did not own. Others, who attempted to farm or hunt and gather on ancestral lands that were now part of Mexican land grants, were viewed as trespassers. Some fled to or continued to live in relatively isolated mountain villages and maintained their traditional culture.

American Period (Began 1848)

This period began with the Treaty of Guadalupe Hidalgo, which brought the war with Mexico to an end. The 1849 Gold Rush brought many people to California, including San Diego County. These people brought new styles of architecture and began to transform the landscape. California achieved statehood in 1849 and San Diego was the first officially recognized County. Many Mexican Ranchos were broken up and became available for settlement. Following the Civil War, the region saw a large increase in population, the arrival of the railroad, and the establishment of an agricultural economy supported by extensive infrastructure. This trend coincided with the establishment of Horton's Addition in 1869, which became downtown modern San Diego. Many of the communities and cities in existence today began as small groups of agricultural homesteads surrounding single room schoolhouses. The City of San Diego expanded rapidly and became the economic focus of the region.

Arriving white settlers forced Indians off the best and most fertile lands. Although a treaty was signed in 1852 with numerous headmen of local tribes, it was rejected by the U.S. Senate and no treaty was ever ratified. The trend of seizing Indian lands intensified after gold was discovered in Julian in 1870. After the best lands had been expropriated, an executive order of 1875 established the first reservations, primarily in locations where Indian villages still existed. Many Indians, such as those who lived on the coast and in the outskirts of San Diego were not granted reservations and became landless. Traditional culture persisted best in more isolated mountain circumstances and where Indians were essentially beyond the reach of the mission and reservation systems. It was during the years between 1875 and 1920 that the pattern of Indian occupation that exists to day in San Diego County was largely established. Most of the current reservations were established during that time, although many Native Americans who currently live in San Diego County do not live on one of the reservations.

3.5.2 Analysis of Potential Impacts

The following is a discussion of the potential impacts to cultural resources in the County of San Diego County from the expansion of existing tribal casinos and the establishment of new casinos. The discussion will be limited to activities that could impact cultural resources on lands within County jurisdiction and that are off-site lands that are not owned in trust by the reservations.

A review of County records of cultural resource studies indicates that cultural resources, including all periods of occupation described above, exist or potentially exist on and around all existing and proposed casinos. These studies, however, are incomplete in that most of the land surrounding potential and existing casino locations has never been systematically surveyed for the purpose of recording and evaluating cultural resources. For this reason, it is not currently possible to comprehensively evaluate the potential impacts to cultural resources from casino operations. Presented below is a discussion of what activities could impact significant cultural resources, what information will be necessary to evaluate those impacts, and recommendations as to how to avoid or mitigate those impacts.

Off-site impacts to cultural resources from the establishment or expansion of tribal casino facilities would potentially occur from road improvements, the extension of utility lines, and the placement of signage along roads. These are activities that would disturb the ground through excavation and grading, and could potentially impact subsurface archaeological deposits or historic structures. It is not possible to evaluate the specific impacts for any of the proposed facilities or expansions because there is not an inventory of cultural resources that could be affected nor is it known what specific off-site project improvements will be required. Given these uncertainties, the following is a recommended procedure that should be implemented to determine potential impacts to cultural resources and possible mitigation.

3.5.3 Conclusions and Recommendations

It is clear that the establishment and expansion of tribal casinos will impact cultural resources. Off-site impacts are most likely to occur from road improvement projects, utility line extensions, and the placement of signage. Given that many of these non-renewable cultural resources are the ancestral archaeological and sacred sites of the local Native American tribes, it is crucial that impacts to these sites are avoided or minimized. The law also requires avoidance or minimization of impacts.

This can be accomplished through consultation, collaboration, and coordination between the County and the tribes at all points during the planning and implementation of projects. This can be achieved based on the process outlined above. If successful, the process will not only minimize impacts to cultural resources, but can serve as the basis of a relationship that is mutually beneficial. The County will be able to carry forward necessary improvement projects while preserving cultural resources. Preservation of these resources is important to local tribes and their study and preservation can be used to educate visitors and residents of San Diego County about the rich Native American past that is all around us.

Based on the conclusions derived from staff's analysis, staff recommends the following:

- 3-16 The County should work with the Tribes in conducting appropriate cultural resource inventories and evaluations for those areas impacted by off-site improvement projects.
- 3-17 The County should work with the Tribes, or their cultural resource specialist, in identifying and implementing appropriate mitigation to prevent the loss of cultural resources where feasible.

3.6 Dark Skies

3.6.1 Background

Light pollution prevention and the maintenance of dark skies is an issue of increasing importance in the County of San Diego. Fortunately, steps can be taken to minimize potentially significant and detrimental effects. The San Diego County Light Pollution Code, effective January 18, 1985 and amended July 17, 1986, was implemented in order to “restrict the permitted use of outdoor light fixtures emitting undesirable light rays into the night sky which have a detrimental effect on astronomical research” (County Light Pollution Code: July 1986). As Sovereign Nations, the Indian Reservations in San Diego County are exempt from the provisions of this Ordinance.

The Light Pollution Code, also known as the Dark Sky Ordinance, specifically addresses ways in which light pollution can be limited and minimized in the unincorporated areas of San Diego County. Parties involved in the development of this code included representatives from the San Diego County Department of Public Works; the Department of Planning and Land Use; as well as representatives from San Diego Gas and Electric Company; Palomar Observatory; and Mount Laguna Observatory.

The County of San Diego is home to two of the United States’ best astronomical research sites: Palomar Observatory and Mount Laguna Observatory. The Light Pollution Code has designated areas within a 15-mile radius of each observatory as Zone A, with all other areas designated as Zone B. Zone A has more stringent lighting restrictions due to its proximity to the observatories.

Indian Gaming Facilities have the potential to significantly impact dark skies in the unincorporated area of the County. There are four reservations in Zone A around Palomar Mountain that have all signed gaming compacts and have either begun or are planning construction: La Jolla, Pala, Pauma, and Rincon. Four other reservations are partially or completely within Palomar’s Zone A but to date have not signed compacts to construct gaming facilities: Yuima, Los Coyotes, Santa Ysabel, and Mesa Grande. With four gaming facilities and four more potential facilities within fifteen miles of Palomar, a potentially significant cumulative impact may occur.

The Mount Laguna Observatory is also greatly at risk. To date, there are three reservations with signed gaming compacts within Laguna’s Zone A: Ewiiapaayp, Campo, and Manzanita. Four additional reservations in Zone A have not signed gaming compacts: La Posta, Inaja, Cosmit, and Capitan Grande. Like the Palomar Observatory, a potentially significant cumulative impact may occur.

In addition to light pollution’s potential impacts to the County’s two observatories, lighting from the Indian Gaming facilities located near local or regional wildlife corridors may impact wildlife movement, breeding and migration patterns, especially when located near riparian habitat. Because the County is home to numerous endangered and threatened species, biological resources are of special concern. Areas in which the skies are the darkest usually indicate a lack of development and large open space areas of natural vegetation and habitat that support regional or local linkages and corridors. The biological resources section

of this analysis better addresses these specific areas, but it is important to note that light pollution may impact biological resources in the County.

Because all light pollution is cumulative, it is vital for each individual gaming facility to make a concerted effort to limit the amount of light pollution emanating from its facility.

3.6.1.1 Lighting Methods

Section 59.105 of the Light Pollution Ordinance, General Requirements, calls out low-pressure sodium (LPS) as the preferred lighting source. This section also mandates that most lighting fixtures be shielded to minimize light spillage and waste. LPS lighting does not interfere with astronomical observations because it can be completely filtered by the observatories.

The light in an LPS fixture is produced from glowing sodium gas in the lighting tube. It requires less wattage to produce a similar amount of light (lumens) as a commonly used mercury vapor (MV) lamp or high-pressure sodium (HPS) lamp. For example, a 175 watt MV lamp commonly used for a number of outdoor applications such as security lighting, a 100 watt HPS lamp, also commonly used outdoors, can both be replaced by a 90 watt or 55 watt LPS lamp, depending on the configuration of the fixture and its intended use. LPS fixtures are commonly used for streetlights, parking lots and security lighting. Shielding of light fixtures is an essential component to the reduction of light pollution required by the Dark Sky Ordinance. A fully shielded outdoor light ensures that light rays emitted from the fixture are projected below the horizontal plane passing through the lowest point on the fixture from which the light is emitted. An unshielded lamp may send greater than 50% of its light upwards and sideways, directly contributing to light pollution. A well-shielded lamp can block more than 90% of this otherwise lost light. It has been estimated that the cost of wasted electricity due to lost light is between \$1 and \$2 billion annually in the United States (Upgren, 1999). As light pollution impacts are all cumulative, the more light added to the sky, the more sky glow would exist.

3.6.1.2 Observatories

Light Pollution is an increasing problem for observatories everywhere. There are only a few high-quality astronomical research sites in the United States. As one of the best astronomical sites in the nation, Palomar Observatory currently meets all of the following criteria. (San Diego County General Plan Conservation Element: April 2000) The five criteria for a high-quality site include:

1. Elevation over 5,000 feet above sea level. A high elevation is necessary to reduce atmospheric light scatteration.
2. Clear, cloud-free night sky. Palomar Mountain and Mount Laguna are the nation's best sites in this respect with an average of 6.4 cloud-free hours per night.
3. Proximity to the Pacific Ocean. The prevailing on-shore winds bring in relatively cool, dust-free air, free of turbulence, resulting in a steady star image.

By contrast, the Atlantic Ocean has primarily warm air currents, which when combined with cool air can cause atmospheric disturbance.

4. Distance from urban areas. The site must be far enough from large lighted areas, generally 30-40 miles, so the sky surrounding the observatory will not be appreciably brightened. (The 200-inch mirror at the Palomar Observatory is strong enough to detect the striking of a match at a point as far away as San Francisco).
5. Freedom from nearby sources of light, dust and smoke. A light source one mile distant has 1,600 times the impact as an equivalent light source at 40 miles distant. Smoke and dust, even in extremely small amounts, are also highly detrimental to observatories.

Sites meeting these criteria are found only in West Texas, Central New Mexico, Arizona, the Central California coast, and San Diego County, of which San Diego County is considered the best. (San Diego County General Plan Conservation Element: April 2000) However, rapid growth and urban sprawl in southern California has resulted in a significant increase in the amount of sky glow. If such light pollution continues to increase, it may seriously reduce the effectiveness of the County's observatories.

Palomar Observatory

Palomar Observatory, located at the top of Palomar Mountain in northern San Diego County near Palomar Mountain State Park, is privately owned and operated by the California Institute of Technology (Caltech) and is used to support some of California's and the United States' premier scientific research programs. By agreement, Caltech shares use of their Hale Telescope with astronomers from Cornell University and the National Aeronautics and Space Administration (NASA) Jet Propulsion Laboratory. The principal instruments at the Palomar Observatory include the 200-inch Hale Telescope, the 48-inch Oschin Telescope, the 18-inch Schmidt Telescope and the 60-inch reflecting telescope (operated jointly by Caltech and the Carnegie Institute of Washington). Palomar is a world-famous observatory annually visited by over 250,000 people. (Palomar Observatory: Visitor Brochure, Internet) Dr. Robert Brucato, the Observatory's Director, is currently overseeing the Palomar visitor center remodeling (Personal Communication: Dr. Robert Brucato, September 2000).

The history of the Palomar Observatory began in the mid-1920's when results from Los Angeles' Mount Wilson Observatory's 100-inch telescope demonstrated the need for a larger instrument if expected advances in astronomical research were to be realized. As a result of the foresight and work of astronomer George Hale, the International Education Board (one of the Rockefeller Foundations) awarded a grant to Caltech for the construction of a 200-inch telescope in 1928. Palomar Mountain was selected in 1934, after testing numerous locations for the right atmospheric conditions needed for astronomical observing proved it to be the best site. (Palomar Observatory: Visitor Brochure, Internet)

Corning Glass Works in New York State successfully cast the new 200-inch Pyrex glass disk, later to become the 200-inch mirror the most integral component of the newly commissioned telescope, in December 1934. After an eight-month cooling period, the 20-

ton disk was shipped by railroad across the United States to Pasadena, California to begin the long grinding and polishing process that would transform it to the right size and shape required for astronomical observations. Construction of the observatory to house the 200-inch Hale telescope, the 100-ton rotating dome and the telescope structure, began in the mid-1930's and was nearly complete by 1941 when the United States entered World War II. The war delayed the completion of the mirror and it was not until November 1947, that the mirror was finished, weighing only 14.5 tons. The mirror began its two-day trip from Pasadena to Palomar Mountain where it received its final polishing and was finally installed in the telescope. (Palomar Observatory: Visitor Brochure, Internet)

Scientific research at the Palomar Observatory has been remarkably successful and productive. The Hale Telescope has been used on virtually every clear night to provide astronomers with the information they need to continue to advance the science of astronomy. The scope of research ranges from studies of asteroids and comets within our solar system to the stars that comprise the Milky Way, to the uncharted and unknown galaxies beyond our own. (Personal Communication: Dr. Robert Brucato, September 2000)

While much of technology has improved within the last fifty plus years, the actual Hale telescope and the observatory facility is as effective as it was when it was installed in 1948. It has since been equipped with high-speed computers and sensors, modifications that have greatly improved its efficiency. (Dr. Robert Brucato, personal communication) Although electronic sensors have replaced photographic techniques used on the Hale telescope by the early astronomers at the Palomar Observatory, this is not the case for the 48-inch Oschin Telescope, which is designed for wide-field viewing. Astronomers have just completed a multi-year-long program in which the Oschin was used to photograph the entire northern sky. The resulting photographic sky atlas will constitute a source of astronomical information for researchers worldwide. (Palomar Observatory: Visitor Brochure, Internet)

Mount Laguna Observatory

San Diego State University and the University of Illinois at Urbana-Champaign operate Mount Laguna Observatory jointly. Located 45 miles east of downtown San Diego in the Cleveland National Forest at an altitude of 6,100 feet, the Mount Laguna Observatory is one of the Country's best astronomical research and education sites (Mount Laguna Observatory Website: Internet). Dedicated on June 19, 1968, the dedication occurred only seven years after the Astronomy Department became a separate entity on the San Diego State University campus. The original funding for the observatory grew from a grant from the National Science Foundation with matching funds from the State of California (San Diego State University Astronomy Department Website: Internet). Currently, the Department and the Observatory are involved with the National Aeronautics and Space Administration (NASA) to build a larger telescope at the Laguna Observatory, a \$4-6 million dollar investment. NASA and the Goddard Space Flight Center plan to contribute to the construction and maintenance of the facility in exchange for 10% of the viewing time (Personal Communication: Dr. Paul Etzel, September 2000).

The three major research instruments at the Mount Laguna Observatory include the 100-inch telescope, 40-inch reflector, the 24-inch reflector, and the 16-inch reflector. Sky conditions

at Mount Laguna enable the astronomers and engineers living at the mountain to conduct their observations almost year-round. (Mount Laguna Observatory Website: Internet)

The Observatory maintains a special 21-inch telescope for public and visitor education. Mount Laguna has dedicated much of its resources to public education. Dr. Paul Etzel, the Observatory Director, and has recently initiated a joint program researching the historic use of astronomy in Native American cultures, involving San Diego State University, the University of California at San Diego, and the Pala Indian tribe (Personal Communication: Dr. Paul Etzel, September 2000).

3.6.2 Analysis of Potential Impacts

3.6.2.1 Individual Projects

Existing Projects

Barona Gaming Facility

The Barona Gaming Facility, one of three existing casinos in the County of San Diego, is located in Zone B, greater than 15 miles from both Palomar and Mount Laguna Observatories and presents a less than significant direct impact to astronomical observations. However, bright lighting associated with the Barona facility may still contribute to sky glow and a potential significant cumulative impact. Therefore, it is important for the Barona Facility to use the same light pollution prevention measures as the facilities within Zone A.

In addition, due to its proximity to Wildcat Canyon Creek, a local wildlife corridor, and the Silverwood Wildlife Sanctuary, bright lighting associated with the facility may impact wildlife movement, breeding and migration patterns. In order to directly address these potential issues and to make specific recommendations, the Department of Planning and Land Use would appreciate the review of the facility's lighting design and signage plan and a biological resources report.

Sycuan Gaming Facility

The Sycuan Gaming Facility, one of three existing casinos in the County of San Diego, is located in Zone B, greater than 15 miles from both Palomar and Mount Laguna Observatories and presents a less than significant direct impact to astronomical observations. However, bright lighting associated with the Sycuan facility may still contribute to sky glow and a potential significant cumulative impact. Therefore, it is important for the Sycuan Facility to use the same light pollution prevention measures as the facilities within Zone A.

In addition, due to its proximity to the Sweetwater River, a regional wildlife corridor, bright lighting associated with the facility may potentially impact wildlife movement, breeding and migration patterns. In order to directly address this issue and to make specific recommendations, the Department of Planning and Land Use would need to review the facility's lighting design and signage plan and a biological resources report. Voluntary compliance with the County Light Pollution Code is suggested.

Viejas Gaming Facility

The Viejas Gaming Facility, one of three existing casinos in the County of San Diego, is located in Zone B, greater than 15 miles from both Palomar and Mount Laguna Observatories and presents a less than significant direct impact to astronomical observations. However, bright lighting associated with the Viejas facility may still contribute to skyglow and a potential significant cumulative impact. Therefore, it is important for the Viejas Facility to use the same light pollution prevention measures as the facilities within Zone A.

In addition, due to its proximity to Viejas Creek, a local wildlife corridor, and the Cleveland National Forest, bright lighting associated with the facility may significantly impact wildlife movement, breeding and migration patterns. In order to directly and adequately address these issues, the Department of Planning and Land Use would need to review the facility's lighting design and signage plan and a biological resources report. Voluntary compliance with the County Light Pollution Code is suggested.

Proposed Facilities

Barona Gaming Facility Expansion

The proposed expansion of the Barona Gaming Facility is located in Zone B of the County, greater than 15 miles from both Palomar and Mount Laguna Observatories and presents a less than significant direct impact to astronomical observations. However, bright lighting associated with the Barona facility expansion may still contribute to skyglow and a potential significant cumulative impact. Therefore, it is important for the Barona Facility to use the same light pollution prevention measures as the facilities within Zone A.

In addition, due to its proximity to Wildcat Canyon Creek, a local wildlife corridor, and the Silverwood Wildlife Sanctuary, bright lighting associated with the facility may impact wildlife movement and migration patterns. In order to directly address these potential issues and to make specific recommendations, the Department of Planning and Land Use would need to review the facility's lighting design and signage plan and a biological resources report. Voluntary compliance with the County Light Pollution Code is suggested.

Jamul Gaming Facility

The proposed Jamul Gaming Facility is located in Zone B of the County, greater than 15 miles from both Palomar and Mount Laguna Observatories and will have a less than significant direct impact to astronomical observations. However, bright lighting associated with the Jamul facility may still contribute to skyglow and a potential significant cumulative impact. Therefore, it is important for the Jamul facility to use the same light pollution prevention measures as the facilities within Zone A.

In addition, due to its proximity to the Sweetwater River and Sweetwater Reservoir, a regional corridor, and its location within the Multiple Species Conservation Program preserve, bright lighting associated with the facility may impact wildlife movement and corridors. In order to directly address these potential issues and to make specific recommendations, the Department of Planning and Land Use would need to review the

facility's lighting design and signage plan and a biological resources report. Voluntary compliance with the County Light Pollution Code is suggested.

Pala Gaming Facility

The proposed Pala Gaming facility is located in Zone A, as defined by the County Light Pollution Ordinance, approximately 12 miles west of the Palomar Observatory. The Draft Environmental Assessment, prepared by Tierra Environmental Services, briefly discusses potential impacts due to casino lighting and acknowledges the importance of maintaining dark skies. Section 6.0, Mitigation Measures, states that impacts associated with dark skies will be mitigated to "an acceptable level", and that the County Light Pollution Code would be adhered to as much as possible. The Pala Gaming Facility Lighting Plan will include the use of low-pressure sodium light fixtures for all parking and security lighting. In addition, all outdoor lighting fixtures will be shielded to prevent upward illumination and spill onto adjacent properties. The report also states that lighting will be kept to a minimum. (Pala E.A., p. 35, 91) It does not address potential impacts to dark skies from decorative lighting, signage or skyglow.

Dr. Paul Etzel, Director of the Mount Laguna Observatory has reviewed the facility's proposed lighting plan and believes it to be sufficient for the prevention of excessive and detrimental light pollution (Personal Communication: Dr. Paul Etzel, September 2000) Dr. Robert Brucato, Director of the nearby Palomar Observatory has not yet had the opportunity to comment (Personal Communication: Dr. Robert Brucato, September 2000).

In addition to potentially significant impacts to dark skies, lighting at the Pala Gaming Facility has the potential to significantly impact the County's biological resources, specifically the federally endangered arroyo southwestern toad (*Bufo microscaphus californicus*). The United States Fish and Wildlife Service (USFWS) provided recommendations regarding lighting in their December 13, 1999 letter to Mr. Chris Norby, the biological consultant hired to investigate biological resources on the proposed Pala Gaming Facility site. The letter states that while the project and associated parking lots and access points will not directly impact arroyo toad breeding habitat, lighting associated with the project may interfere with the toad's breeding season. The USFWS letter suggests that the project use a buffer between project development areas and native vegetation, and they recommend that the project avoid using lights within the buffer area, especially during breeding season.

In order for the Department of Planning and Land Use to more adequately determine this project's potential impacts to dark skies and sensitive species, staff would require the review of a visual impact analysis focusing on potential dark skies impacts, as well as the gaming facility's lighting plan and a biological resources report.

Rincon Interim Gaming Facility

The proposed Rincon Interim Gaming facility is located in a Zone A area, as defined by the County Light Pollution Ordinance, approximately 8 miles southeast of the Palomar Observatory. The Draft Environmental Evaluation, prepared by KEA Environmental, Inc., does not directly discuss potential impacts to dark skies resultant from light pollution. The

Off-Reservation Environmental Impact Analysis Checklist lists that there will be no adverse effect resultant from the project's lighting. The Aesthetics section of the Checklist states that the interim facility will require night lighting for the parking lot, traffic circulation, security, and pedestrian safety. Effects from the lighting will be mitigated to a level below significance by adhering to the County's Light Pollution Code. All outdoor lighting will utilize low-pressure sodium lamps and will have fully downshielded fixtures to prevent light spillage. The number of lights used will be minimized. It does not address potential impacts to dark skies from decorative lighting or signage.

Due to its proximity to Palomar Observatory, potentially significant impacts to dark skies may occur. In addition, the proposed project may be located along the San Luis Rey River, a regional wildlife corridor, and the Hellhole Canyon County Open Space Preserve. Potentially significant effects to biological resources may occur due to bright lighting, which may impact wildlife movement, breeding and migration patterns.

In order for the Department of Planning and Land Use to more adequately determine this project's potential impacts to dark skies and sensitive species, staff would require the review a visual impact analysis focusing on potential dark skies impacts, the gaming facility's lighting plan, and a biological resources report.

Rincon Permanent Gaming Facility

The Rincon permanent gaming facility will be located in a Zone A area of the County of San Diego. The Department of Planning and Land Use has not yet had the opportunity to review any plans for Rincon's permanent gaming facility. The information provided to the County on the Interim facility indicates that the Rincon tribe will attempt to minimize off-site environmental effects from light pollution. Additional potentially significant impacts to off-site biological resources may also occur as a result of the expansion.

In order for the County to adequately determine potential off-site impacts to dark skies and the nearby Palomar Observatory, staff would require the review of a visual impact analysis focusing on potential dark skies impacts, the facility's lighting plan, and a biological resources report.

San Pasqual Temporary Gaming Facility

The San Pasqual Indian Reservation is located within a Zone A area, as defined by the County Light Pollution Code. The Aesthetics section of the Environmental Assessment, prepared by L. Robert Ulbarri with Environmental Planning Services, briefly discusses potential impacts to dark skies. It states that nighttime aesthetic values will be preserved by requiring the installation of shielded light fixtures, low-pressure sodium lamps, and the lighting plan will prohibit the use of neon or flashing lighting signage. In addition, a regional wildlife corridor, the San Luis Rey River runs through the Reservation into Lake Wohlford, located close to the project site.

Therefore, the proposed project has the potential to significantly impact astronomical observations. Potentially significant effects to biological resources may also occur due to bright lighting, which may impact wildlife movement, breeding and migration patterns. In

order for the County to adequately determine potential off-site impacts to dark skies, the nearby Palomar Observatory, and biological resources, staff would require the review of a visual impact analysis focusing on potential dark skies impacts, the facility's lighting plan and a biological resources report.

San Pasqual Permanent Gaming Facility

The San Pasqual permanent gaming facility will be located in a Zone A area of the County of San Diego. The Department of Planning and Land Use has not yet had the opportunity to review any plans for San Pasqual's permanent gaming facility. The information provided to the County on the Interim facility indicates that the San Pasqual tribe will attempt to minimize off-site environmental effects from light pollution. Additional potentially significant impacts to off-site biological resources may also occur as a result of the expansion.

In order for the County to adequately determine potential off-site impacts to dark skies and the nearby Palomar Observatory, staff would require the review of a visual impact analysis focusing on potential dark skies impacts, the facility's lighting plan and a biological resources report.

Anticipated Facilities

Campo Gaming Facility

The Department of Planning and Land Use has not yet had the opportunity to review any plans for the Campo Gaming Facility. Part of the tribe's reservation lands are located in a Zone A area of the County of San Diego, as close as 12 miles south of the Mount Laguna Observatory. Much of the reservation's lands exist in a Zone B area. In addition, Campo Creek and Diablo Canyon Creek, local and regional wildlife corridors, are located close to the proposed project site.

Based on the location of the facility, lighting may or may not present a significant impact to astronomical observations at the Mount Laguna Observatory. Bright lighting associated with the project may also have the potential to significantly impact wildlife movement, breeding and migration patterns. In order for the County to adequately determine potential off-site impacts to dark skies, the nearby Mount Laguna Observatory, and biological resources, staff would require the review of a visual impact analysis focusing on potential dark skies impacts, the facility's lighting plan and a biological resources report.

Ewiiapaayp Gaming Facility

The Department of Planning and Land Use has not yet had the opportunity to review any plans for the Ewiiapaayp Gaming Facility. If located on the Ewiiapaayp Reservation, the facility will be located in a Zone A area of the County of San Diego, approximately three miles south of the Mount Laguna Observatory. In addition, La Posta Creek, the Cleveland National Forest, Anza Borrego State Park, and Mount Laguna, local and regional wildlife corridors and preserves, are at close proximity to the proposed project site.

Therefore, any project proposed on the Reservation has the potential to significantly impact astronomical observations. Potentially significant effects to biological resources may also occur due to bright lighting, which may impact wildlife movement and migration patterns. In order for the County to adequately determine potential off-site impacts to dark skies, the nearby Mount Laguna Observatory, and biological resources, staff would require the review of a visual impact analysis focusing on potential dark skies impacts, the facility's lighting plan and a biological resources report.

However, staff understands that current plans for the Ewiiapaayp Facility place the facility on an approximately 10-acre parcel of land located approximately 1 mile west of Viejas Casino. If placed here, the facility would be located in Zone B, greater than 15 miles from both Palomar and Mount Laguna Observatories and would present a less than significant direct impact to astronomical observations. However, bright lighting associated with such a facility may still contribute to skyglow and a potential significant cumulative impact. Therefore, it is important for the facility to use the same light pollution prevention measures as the facilities within Zone A.

In addition, due to its proximity to Viejas Creek, a local wildlife corridor, and the Cleveland National Forest, bright lighting associated with the facility may significantly impact wildlife movement, breeding and migration patterns. In order to directly and adequately address these issues, the Department of Planning and Land Use would need to review the facility's lighting design and signage plan and a biological resources report. Voluntary compliance with the County Light Pollution Code is suggested.

La Jolla Gaming Facility

The Department of Planning and Land Use has not yet had the opportunity to review any plans for the La Jolla Gaming Facility. The facility will be located in a Zone A area of the County of San Diego, approximately six miles south of the Palomar Observatory. In addition, the San Luis Rey River and the Cleveland National Forest, regional wildlife corridors and preserves, are located close to the proposed project site.

Therefore, the proposed project has the potential to significantly impact astronomical observations. Potentially significant effects to biological resources may also occur due to bright lighting, which may impact wildlife movement and migration patterns. In order for the County to adequately determine potential off-site impacts to dark skies, the nearby Mount Laguna Observatory, and biological resources, staff would require the review of a visual impact analysis focusing on potential dark skies impacts, the facility's lighting plan and a biological resources report.

Manzanita Gaming Facility

The Department of Planning and Land Use has not yet had the opportunity to review any plans for the Manzanita Gaming Facility. The facility will be located in a Zone A area of the County of San Diego, approximately 10 miles southeast of the Mount Laguna Observatory. In addition, Campo Creek and Diablo Canyon Creek, local and regional wildlife corridors, are located close to the proposed project site.

Therefore, the proposed project has the potential to significantly impact astronomical observations. Potentially significant effects to biological resources may also occur due to bright lighting, which may impact wildlife movement and migration patterns. In order for the County to adequately determine potential off-site impacts to dark skies, the nearby Mount Laguna Observatory, and biological resources, staff would require the review of a visual impact analysis focusing on potential dark skies impacts, the facility's lighting plan and a biological resources report.

Pauma Gaming Facility

The Department of Planning and Land Use has not yet had the opportunity to review any plans for the Pauma Gaming Facility. The facility will be located in a Zone A area of the County of San Diego, approximately 6 miles west of the Palomar Observatory. In addition, Agua Tibia Creek, a local wildlife corridor and a tributary to the San Luis Rey River regional corridor, is located close to the proposed project site.

Therefore, the proposed project has the potential to significantly impact astronomical observations. Potentially significant effects to biological resources may also occur due to bright lighting, which may impact wildlife movement and migration patterns. In order for the County to adequately determine potential off-site impacts to dark skies, the nearby Palomar Observatory, and biological resources, staff would require the review of a visual impact analysis focusing on potential dark skies impacts, the facility's lighting plan and a biological resources report.

3.6.3 Conclusions and Recommendations

The sole way to successfully preserve the dark skies necessary for the high caliber of astronomical observations taking place at Palomar Observatory and Mount Laguna Observatory, is through voluntary compliance with the County's Light Pollution Code. Many of the Indian Gaming Facilities have provided preliminary information regarding their plans to use low-pressure sodium lamps and shielded fixtures. However, many of the light fixtures and lamps necessary for signage and advertising cannot be filtered by the observatories and may still present a significant impact to astronomical research as well as off-site biological resources.

Based on their review of the potential dark skies impacts, County staff makes the following recommendations:

- 3-18 The tribes are encouraged to use low-pressure sodium lights with shielded fixtures, especially those within Zone A areas, per the County Light Pollution Code. Limited decorative lighting and signage is also suggested.
- 3-19 The County recommends that representatives from tribes located within Zone A areas work together with Dr. Robert Brucato of the Palomar Observatory and Dr. Paul Etzel of the Mount Laguna Observatory. They have both expressed a great deal of interest in collaborating with the proposed gaming facilities in order to prevent light pollution and maintain the quality of dark skies surrounding their respected facilities. Additionally, County staff is available for consultation and

would appreciate the opportunity to review any lighting plans available in order to diminish the potential impacts of bright lighting.

- 3-20 The County recommends that the suggestions issued by the U.S. Department of Fish and Wildlife, as previously discussed in the assessment of the proposed Pala Gaming Facility, be adhered to as much as possible.
- 3-21 The County recommends submittal of visual impact surveys specifically addressing dark skies and light pollution impacts. It would also be helpful to review biological resources reports that address potential impacts to wildlife movement, breeding and migration patterns from light pollution.

3.7 Growth Induction

3.7.1 Background

The California Environmental Quality Act requires Environmental Impact Reports to discuss the growth inducing impact of each project. A development project that fosters economic or population growth, or the construction of additional housing, either directly or indirectly, in the area surrounding the project is considered growth inducing. Included in this are projects that remove obstacles to population growth. For example, a major expansion of a wastewater treatment plant might allow for more construction in the service area.

According to the California Environmental Quality Act, it should not be assumed that growth in any area is necessarily beneficial, detrimental or of little significance to the environment. Growth inducing impacts must be discussed in Environmental Impact Report to determine if the increases in population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.

3.7.2 Analysis of Potential Impacts

3.7.2.1 Existing Gaming Facilities

The existing gaming facilities on the Barona, Sycuan and Viejas Reservations have not fostered economic or population growth, or the construction of additional housing, either directly or indirectly, in the areas surrounding the facilities. The areas surrounding these Reservations have not experienced an accelerated increase in housing construction or an accelerated increase in construction of infrastructure or community service facilities. In addition, there has not been an increase in the number of requests to amend the General Plan or zoning designations to accommodate more housing or commercial uses. Therefore, the presence of these facilities has not led to growth and construction in areas under County jurisdiction that has caused significant environmental effects.

3.7.2.2 Proposed Gaming Facilities

If the existing gaming facilities are used as an example, it can reasonably be expected that the proposed gaming facilities will not have significant growth inducing impacts on nearby land under County jurisdiction. But unlike existing gaming facilities, several of the

proposed facilities include wastewater treatment plants. If service were to be extended to land under County jurisdiction, the growth inducing impacts of providing this type of urban service could be significant. Because these plants are intended to serve only uses on the Reservations at this time, and service will not be made available to adjacent land under County jurisdiction, the impacts are not expected to be significant.

3.7.3 Conclusions and Recommendations

It is unlikely that sewer service will be extended to the County lands in the future. The General Plan Land Use Element discourages any extension of urban services, such as sewer, into the Estate Development and Rural Area of the County. All of the areas under County jurisdiction near the Reservations are in the Estate Development and Rural Areas. In addition, two goals of the General Plan include:

- Locate future urban growth within and adjacent to existing urban areas and retain the rural setting and life-style of the remaining portions of the unincorporated areas.
- Phase growth with essential facilities.

Considering these goals of the General Plan, it is not expected that provision of sewer service on Reservation lands will lead to significant growth inducing impacts on adjacent County lands. As such, no recommendations have been made.

3.8 Health and Human Services

3.8.1 Background

3.8.1.1 Emergency Medical Services

The provision of emergency medical services is accomplished through agreements between the County and eligible jurisdictions. Currently, advanced life support ambulance services are available at the local fire departments of the Barona, Sycuan and Viejas Indian Reservations. These reservations provide trained personnel who staff the ambulances at the reservation fire department locations and respond to emergencies on the reservation. In 1999, ambulances stationed on the Barona Reservation responded to 1,695 calls to the Barona casino. Ambulances stationed at the Viejas Reservation responded to 588 calls on the reservation and ambulances stationed at the Sycuan Reservation responded to 748 calls on the reservation. If definitive care is required the patient is transported off the reservation to local community hospitals.

3.8.1.2 Health Services

Interviews with local Indian Health Clinic representatives have indicated that reservations that do not have gaming often have a higher number of residents who are uninsured or who have Medi-Cal. When gaming is established, residents and employees of the casinos are able to purchase commercial insurance and have greater opportunities for health care services.

3.8.2 Analysis of Potential Impacts

3.8.2.1 Emergency Medical Services

The installation of gaming devices on reservations creates an increase of off-reservation visitors and a larger employee population. With this increase of people visiting reservations, there is an expected increase of 9-1-1 calls. Responses to 9-1-1 calls must be timely and necessitate the prompt availability of ambulances. Many reservations are located in rural areas, where ambulance responses are often longer due to greater distances that need to be traveled. If reservations were to rely on off-reservation local ambulance responses, longer response times are expected.

It is important for reservations to have agreements with neighboring ambulance providers (public or private) to assist with on-reservation responses. In return, the reservation would want to provide reciprocity to those off-reservation providers in the event of a nearby off-reservation event.

Planning for emergency service delivery is important in assuring appropriate care is available to visitors (patrons) and employees of the gaming facility (compact Section 10.4). A rapid 9-1-1 response is best achieved when multiple ambulance providers are available.

3.8.2.2 Health Services

With the availability of commercial insurance to residents and employees of the reservation, there is greater opportunity for participation in primary and preventive health. Expanded demand for primary care services as well as dental and childcare services is expected. Gaming provides a source of income to tribal nations that can yield a positive effect on the health of their residents.

3.8.3 Conclusions and Recommendations

- 3-22 The County of San Diego should encourage, and if necessary, assist the Tribes in developing ambulance services that are readily available for on-reservation visitors, residents and gaming employees through agreements with off-reservation ambulance providers or by providing 9-1-1 services on the reservation.
- 3-23 The County should encourage the Tribes to make adequate health care coverage for residents and employees of the reservation one of the first benefits that tribal nations implement.

3.9 Hydrology and Water Quality

3.9.1 Background

The San Diego Region contains eleven major drainage systems within what is called the San Diego Basin. The Regional Water Quality Control Board (RWQCB) designates this area as Region 9 in California. The San Diego Basin (Region 9) consists of a number of rivers and tributary creeks and water storage facilities located throughout the basin.

The RWQCB is charged with the establishment of ground and surface water quality objectives for the San Diego region. These objectives are contained in the RWQCB planning document called the Comprehensive Regional Water Quality Control Plan for the San Diego Basin, or the "Basin Plan" (RWQCB 1994). The Basin Plan identifies existing and potential uses for ground and surface waters, and establishes numerical and narrative water quality objectives for these waters on a watershed-by-watershed basis.

Runoff from precipitation and groundwater discharges account for almost all-surface water flows in the basin. Erosion and sedimentation that occurs with excess amounts of runoff can affect the quality of surface flows. In addition, increasing development can alter the pattern of runoff and increase sediment flows as well.

Development projects that have the potential to affect public waters and water conveyance systems must conform to several regulations, including the Federal Clean Water Act (CWA). The CWA's mandate is established through compliance with the requirements of the State Water Resources Control Board's (SWRCB) general permit for the National Pollutant Discharge Elimination System (NPDES). The SWRCB also issues permits for individual projects under the title "Waste Discharge Requirements for Discharges of Stormwater Runoff Associated with Construction Activity." Several proposed revisions to the regulation of stormwater runoff have recently been set forth that apply to all development projects throughout California. For tribal areas, the Environmental Protection Agency (EPA) regulates NPDES matters on a nationwide basis.

For a project to comply with the requirements of the Waste Discharge Permit, permittees must file and complete a Notice of Intent (NOI) with the SWRCB prior to construction. Compliance requires conformance with applicable Best Management Practices (BMP's) and the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and monitoring program. Upon completion of construction, a permit holder must file a Notice of Termination with the SWRCB.

The major off-site streambeds that could be affected by Indian gaming facilities include the San Luis Rey River, the San Diego River, the San Dieguito River, the Sweetwater River, Campo Creek, and other tributaries of these streams.

3.9.2 Analysis of Potential Impacts

3.9.2.1 Individual Projects

The off-site impacts of individual Indian gaming facilities cannot be adequately assessed at this time. There are three existing gaming facilities at Barona, Sycuan, and Viejas. There are proposed new gaming facilities at Jamul, Pala, Rincon, and San Pasqual, and an on-going expansion project at the Barona Reservation. The Rincon and San Pasqual proposals have both temporary and permanent component to them. Other tribes that may have gaming facilities in the future include Campo, Ewiiapaayp, La Jolla, Manzanita, and Pauma. All of these could result in off-site hydrology and water quality impacts.

In general terms, hydrology and water quality impacts result from all new construction activities. Grading of sites for future casinos could alter existing drainage patterns, which could increase the risk of erosion and sedimentation that occurs both on and off-site. Any

grading near streambeds located on reservation land could have adverse effects on off-site downstream areas if construction were to occur in or adjacent to the streambeds.

Construction activities have the potential to create adverse downstream impacts, and the introduction of large amounts of impervious surfaces for parking lots could also increase the rate and amount of runoff. The addition of large structures needed for the gaming facilities could also increase the rate of runoff and could cause significant off-site hydrology and water quality impacts.

3.9.2.2 Cumulative Impacts

The cumulative off-site impacts of existing and proposed Indian casino projects, a total of fourteen projects, could reduce off-site regional and local water quality due to increased erosion and sedimentation for the reasons discussed above. Grading impacts to streambeds located on reservations could result in cumulative off-site erosion and sedimentation impacts if construction were to occur in and around the streambeds. Off-site hydraulic impacts could occur to the San Luis Rey River, the San Diego River, the San Dieguito River, the Sweetwater River, Campo Creek, and other tributaries of these streams. Increases in erosion and sedimentation can result in a decrease of downstream water quality on a cumulative basis that cannot be quantified due to lack of data, both on individual projects and on all the projects collectively. Preparation of proper Stormwater Pollution Prevention Plans (SWPPP's) and implementation of Best Management Practices (BMPs) before, during, and after construction can help alleviate individual project level and cumulative gaming facility project impacts. However, until environmental documents are prepared for Indian gaming facilities that include both individual project level analysis and cumulative analysis, these impacts cannot be quantified.

3.9.3 Conclusions and Recommendations

Indian gaming facilities are subject to the Federal Clean Water Act and/or the State Water Resources Board's National Pollutant Discharge Elimination System, with oversight by the Environmental Protection Agency. As such, a number of measures should be included to lessen the potential off-site impacts of these facilities. On an individual and cumulative project basis, preparation of SWPPP's would address both on and off-site water quality impacts, and implementation of BMP's before, during, and after construction, would allow for facilities to be built that could handle excess runoff, erosion, and sedimentation. Site specific mitigation measures, such as control of surface drainage, use of holding basins to capture sediment, landscaping and irrigation of slopes, proper design of drains to control runoff, mechanical sediment trapping devices, use of sandbags, matting, mulches, and berms, and other methods could be used to alleviate erosion and sedimentation impacts. Impacts can only be addressed when details are available for projects as they are proposed.

Based on the strong potential for impacts to water resources in San Diego County, staff recommends that:

- 3-24 The County should encourage the Tribes to consult/work with the EPA, the State Water Resources Control Board, the Regional Water Quality Control Board, and the County Department of Public Works Staff to ensure that projects propose and implement appropriate management strategies to preclude impacts to water quality as a result of construction and post-construction activities.

3.10 Noise

3.10.1 Background

Based on previous review of Environmental Assessments for Indian gaming facilities, traffic causes the predominant off-site potential noise impact from these projects. The County Department of Public Works has recently calculated and tabulated potentially adverse traffic impacts in terms of Average Daily Trips (ADT) using the best available information for this document. Staff sees the potential benefit from this tabulation in finding noise impacts. However, staff has pointed out in the previous four reviews that a comprehensive noise study is required to assess the potential impacts on the basis of the Community Noise Equivalent Level (CNEL).

The County has adopted CNEL thresholds in the Noise Element of the General Plan for identifying potential impacts (see Appendix B). The goal of any noise assessment is to seek mitigation measures or design elements that reduce any such impacts below these thresholds. The staff reviews of previous assessments for Indian gaming facilities do not include CNEL contours or lack sufficient information to estimate them. The use of CNEL or even DNL (Day-Night Level) provides a more realistic measure of adverse noise impacts to Noise Sensitive Areas (NSA), like off-reservation residences, because it includes a 24-hour assessment of traffic volume, speed, mix, and propagation conditions. The percentage of nighttime traffic activity associated with proposed gaming facilities has been described in the Environmental Assessments to exceed the County average by a range of 10 to 22 percent. This result will boost the CNEL to a higher degree than a typical noise distribution seen in County studies.

County staff is also concerned about potential noise impacts from on-site activities to off-reservation residences. Any outdoor activities such as concerts or shows that may generate sound levels that exceed the limits set by Section 36.404 of the County Noise Ordinance (see Appendix B) at these residences would have the potential to become a noise issue and a jurisdictional issue. For example, concerts in the Anaheim area are documented in the acoustical literature with a pattern of noise complaints up to 10 kilometers away from an outdoor stage. The previous reviews for gaming facilities do not contain a complete conceptual description or listing of any noise-producing activities for either the construction or operational phases of their implementation.

3.10.2 Analysis of Potential Impacts

Without the CNEL data described in the previous section, staff is currently unable to assess noise impacts independently or to substantiate the recommendations or claims of any of the assessments that have been reviewed by the County to date. However, the Preliminary Traffic Assessment of Indian Gaming Projects in the San Diego Region, included as Appendix A of this Report, contains a series of ADT tabulations for buildout conditions that provides a means to identify road segments that possess the highest likelihood of having potential noise impacts from gaming facilities and their cumulative effects. The following section on gaming facilities lists roadways with currently proposed project related ADT increases at buildout in parentheses for direct and cumulative impacts. Each listed roadway is characterized by the road segment with the largest ADT increase that may or may not be a

potential noise impact in a comprehensive acoustical study and to give a relative scale of the possible impact to each circulation element roadway.

3.10.2.1 Individual Projects

Barona Gaming Facility: Ashwood Street (5,200), Dye Road or Ramona Street (3.5), Maplevue Street (4,500), San Vicente Road (5,900), Wildcat Canyon Road (7,100), Willow Road (11,200), and SR 67 (11,000) will be affected by the proposed expansion of the existing facility.

Sycuan Gaming Facility: The Sycuan Reservation has an existing facility and no future impacts are tabulated beyond the current buildout estimate in Appendix A.

Viejas Gaming Facility: The Viejas Reservation has an existing facility and no future impacts are tabulated beyond the current buildout estimate in Appendix A.

Jamul Gaming Facility: Jamacha Road (2,600), Jefferson Road (2,600), Lyons Valley Road (2,600), Proctor Valley Road (10,300), SR 94 (20,900), and Willow Glen Drive (6,200) will be affected by the proposed facility on the Jamul Reservation.

Pala Gaming Facility: Cole Grade Road (1,200), Lake Wohlford Road (1,200), Lilac Road (2,400), Pala Temecula Road (1,200), Rice Canyon Road (1,200), Pala Road/SR 76 (18,200), and Valley Center Road (1,200) will be affected by the proposed facility on the Pala Reservation.

Rincon Gaming Facility: Cole Grade Road (200), Lake Wohlford Road (1,900), Lilac Road (400), Old Castle Road (700), Mountain Meadow Road (1,400), SR 76 (700), and Valley Center Road (5,600) will be affected by the proposed project.

San Pasqual Gaming Facility: Cole Grade Road (5,500), Lake Wohlford Road (14,000), Lilac Road (3,000), Old Castle Road (1,000), Mountain Meadow Road (18,100), SR 76 (6,000), Valley Center Road (14,000), and Woods Valley Road (2,500) will be affected by the proposed temporary and/or permanent facility proposals at the San Pasqual Reservation.

As of the draft date of this report, no project-specific data was available in order to adequately address potential impacts at the following proposed gaming facilities: Campo, Ewiiapaayp, La Jolla, Manzanita, Pauma, La Posta, Mesa Grande, Los Coyotes, and Inaja/Cosmit Reservations.

3.10.2.2 Cumulative Impacts

The following listing identifies potential noise impacts for roadway segments and the numbers in parentheses are the largest differences in ADT between simple facility buildout (2020) and the buildout with cumulative impacts. Each listed roadway is again characterized by an ADT change that might produce a potential noise impact in a comprehensive acoustical study. These assigned values provide only a relative scale of the possible long term impact with respect to a particular circulation road. The development of CNEL levels from these cumulative impacts of ADT plus additional traffic mix, speed, volume, and day/night distribution data would provide an estimate of the potential noise impact from

each contributing facility and it would serve as a basis to apportion the burden of any required noise mitigation measures.

Barona Gaming Facility: There are no differences between the direct buildout ADT values and the cumulative buildout ADT associated with the proposed expansion of the existing facility.

Sycuan Gaming Facility: The Sycuan Reservation has an existing facility and no future cumulative impacts are tabulated beyond the current buildout estimate for all circulation elements in the vicinity.

Viejas Gaming Facility: The Viejas Reservation has an existing facility and no future cumulative impacts are tabulated beyond the current buildout estimate for all circulation elements in the vicinity.

Jamul Gaming Facility: There are no cumulative effects because the road segments have no differences between their direct buildout ADT values and the cumulative buildout ADT associated with the proposed Jamul facility.

Pala Gaming Facility: Cole Grade Road (700), Lake Wohlford Road (15,500), Lilac Road (1,600), SR 76 (6,400), and Valley Center Road (8,500) will also be affected cumulatively by Rincon and San Pasqual proposed facilities.

Rincon Gaming Facility: Cole Grade Road (1,700), Lake Wohlford Road (14,000), Lilac Road (2,400), SR 76 (19,900), Old Castle Road (1,000), Mountain Meadow Road (16,900) and Valley Center Road (15,300) will also be affected cumulatively by Pala and San Pasqual proposed facilities.

San Pasqual Gaming Facility: Cole Grade Road (1,400), Lake Wohlford Road (1,500), Lilac Road (1,800), SR 76 (17,700), Old Castle Road (200), Mountain Meadow Road (300), and Valley Center Road (7,200) will also be affected cumulatively by Pala and Rincon proposed facilities.

3.10.3 Conclusions and Recommendations

Staff recommends that better acoustical studies be conducted for all proposed facilities in order to adequately address impacts from road noise. Previous noise assessments have not provided sufficient information to make recommendations about the extent of the noise impacts from the Indian gaming facilities. Future improvements or the reclassification of circulation element roads may improve the Level of Service for impacted roadways as well as the associated air quality of the region. However, these improvements will also increase the traffic noise levels along with higher traffic speeds and volumes as a direct consequence. The final configuration of these roadway improvements should be incorporated into any subsequent noise study for these gaming facilities.

The Department of Public Works has compiled a traffic study that makes projections about future ADT and Level of Service. This tabulation is a critical first step in the identification of road segments that are the major candidates for potential noise impacts. As a second step, measurements of traffic volume, mix, and speeds for these roadways are needed for a

comprehensive noise study. A data-sharing arrangement between the gaming tribes would reduce data redundancy for roadways with cumulative or shared impacts and provide a consistent database for determining CNEL and the design of mitigation measures. Field measurements are required to calibrate the noise model for each roadway. Finally, the hourly traffic volume logged from 24-hour counts of the existing gaming facilities could be used as a scale for proposed facilities in order to estimate their contribution to future CNEL. The resulting CNEL contours could then be used to identify noise sensitive areas or residences that will be impacted by the gaming facilities and to develop mitigation measures as needed. Staff encourages the gaming tribes to contact the County about any technical issues in conducting noise studies. There are also County-certified acoustical consultants who can furnish the additional expertise needed to complete this work and to provide reliable recommendations that can be reviewed and supported by the County. Staff has included an appendix with portions of Policy 4b of the Noise Element of the County General Plan and Section 36.410 of the County Noise Ordinance that pertains to noise from construction activities.

Based on the preliminary analyses conducted, staff recommends that:

- 3-25 The County should work with the Tribes to ensure that appropriate acoustical studies are prepared for all proposed facilities in order to adequately address impacts from roadway noise.
- 3-26 The County should encourage the Tribes to implement a data-sharing arrangement between the Tribes and the County to reduce data redundancy for roadways with cumulative or shared impacts and provide a consistent database for determining CNEL and the design of mitigation measures.
- 3-27 The County should encourage the Tribes to contact the County about any technical issues in conducting noise studies.

3.11 Public Safety

3.11.1 Background

With the exceptions of traffic enforcement and alcohol beverage control, the San Diego County Sheriff currently provides all basic law enforcement services to the three existing tribal casinos. Recent analysis of the Sheriff's service calls indicates that the majority of calls were related to incidents on the reservations. This determination was made mostly based on the addresses to which the deputies were dispatched. Although there were service calls at addresses in the immediate off-reservation vicinity of the casinos, the historical data does not indicate any significant change in service calls since the casinos were expanded from their original bingo facilities. Currently, none of the three law enforcement agencies (Sheriff, California Highway Patrol and State Alcohol Beverage Control) in the unincorporated area separate their report crime data based on indicators that could determine if off-reservation incidents were casino related.

3.11.2 Assessment of Potential Impacts

The potential public safety impact that may result from the increasing numbers of tribal casinos throughout the county is expected to be related to the implementation of the Tribal-State Gaming Compact for each additional casino. In order to identify and research all the law enforcement issues related to these gaming compacts, the San Diego County Sheriff is chairing a statewide committee that includes representatives of California Sheriff Departments, tribal leaders, the Bureau of Indian Affairs, the State Attorney General and other law enforcement organizations. The statewide committee is expected to issue its draft tribal compact law enforcement report in October 2000.

Following the release of this report, Sheriff Kolender will host the first Tribal & Law Enforcement Summit in late November 2000. Tribal leaders and representatives of all involved law enforcement agencies will be invited to participate during this two-day event.

The topics that are anticipated to be covered include:

- The sovereignty of Indian nations,
- History of tribal law enforcement,
- Gaming enforcement vs. tribal law enforcement,
- Analysis of federal law,
- State Attorney General's analysis,
- Tribal police and sheriffs collaboration; and,
- Options for providing law enforcement services on tribal lands.

3.11.3 Conclusions and Recommendations

As the chief law enforcement officer in the region, the Sheriff will continue to coordinate the law enforcement services with the 18 Native American reservations. Sheriff's Department officials are currently meeting with local law enforcement and tribal leaders throughout the nation to gain a better understanding of the different law enforcement models that have been implemented. It is their goal of using this knowledge to help develop collaborative law enforcement services that will meet the public safety needs of all San Diego County visitors and residents.

3.12 Water Resources

3.12.1 Background

All of the current operating casinos, as well as most of the proposed casinos, are dependent on the underlying groundwater resources (the only exceptions are Jamul and San Pasqual which have access to imported water.) Most all of the casinos are in rural outlying areas of the County that do not have access to imported water. Thus, in these areas, groundwater is the only source of irrigation and domestic water supply. San Diego County has very limited groundwater resources due to the following reasons:

1. Groundwater recharge is limited because of low average annual precipitation. Within the County, average annual precipitation varies from about 9 inches per year along the Coastal region to greater than 45 inches at Mount Palomar to less

than 3 inches in the eastern deserts. The low amount of precipitation limits groundwater recharge; and

2. The groundwater basins are very restricted due to a low amount of storage. Most of the basins are composed of a thin layer of soils and weathered materials over a base of fractured crystalline rocks. The crystalline rocks have extremely limited storage capacity that restricts water availability, especially during drought conditions. These two factors severely restrict the availability of groundwater resources throughout the County.

In the groundwater dependent areas of the County, groundwater resources are the only source of water. If these resources are depleted, the results would be dry wells and inadequate water supply for domestic, irrigation and fire flow requirements. In regions of the County where imported water is not available, the potential for obtaining imported water is very small. This is due to the additional cost of annexing lands into the various water districts and the overall lack of additional water supply in the desert Southwest of the United States.

A number of technical factors are required to make the determination if adverse groundwater impacts would result from development. These factors include: 1) size of watershed, 2) groundwater recharge rate, 3) quantity of groundwater storage, 4) amount of total and project specific groundwater extraction within the basin, and 5) location of production wells on the project and neighboring wells that could be impacted. Without all these elements being known, it is virtually impossible to predict the extent of adverse impacts.

Water demand for Indian gaming facilities is difficult to project. In general, water demand from gaming facilities is small, and is restricted to water use within either hotel or restaurant facilities associated with the gaming activities. Water use is projected at 2.6 gallons per meal served for restaurants and 31.7 gallons per person per day for a hotel use. Generally all the Indian Casinos have or propose wastewater treatment facilities that either reuse the water for non-potable use or irrigation. Thus the gaming facility, by itself is not a large significant water use. However associated facilities i.e. hotels, restaurants, and golf courses can use significant quantities of water. In particular, golf courses are very water intensive and are likely to be very impactful to surrounding groundwater resources.

3.12.2 Analysis of Potential Impacts

The following section provides a breakdown of the potential impacts to groundwater resources. In addition, **Error! Reference source not found.** below summarizes the casinos and potential impacts to the underlying groundwater resources.

3.12.2.1 Individual Projects

Existing Facilities

Barona Gaming Facility

The Barona Reservation covers 5,903 acres and is located in a northeast to southwest trending valley. The northern portion of the Reservation drains toward the north and into

San Vicente Creek. However, the greater portion of the Reservation drains toward the southwest into Padre Barona Creek that flows into San Vicente Reservoir. This is the area of the Reservation that supports the proposed golf course and hotel and gaming complex.

The watershed tributary to the Barona Reservation is approximately 9,000 acres, in which about 4,000 acres are trust lands held in trust for the Barona Band. (The remaining 1,903 acres of the Reservation are located in the northern watershed.) However the tribe claims the water rights to the entire basin including off-reservation lands. This is a complex legal matter that will not be addressed in this report, but is related to how the Reservation was established first in 1875 and 1877 and then physically moved in 1939.

A groundwater investigation was completed for the Reservation by the United States Geological Survey (USGS) in 1977, (Open File Report 77-289). The conclusion stated within the report on page 7 is as follows: The reservation seems to have an adequate water supply for domestic use, grazing cattle, and some light irrigation. Any attempt to irrigate large acreage on the reservation by wells may be detrimental to the naturally sub irrigated land in Barona Valley, depending on the location of the pumping wells. This conclusion from the USGS report implies limited water resources and a restricted capacity to meet large irrigation demands on the Reservation.

Currently, water production on the Reservation is occurring in a number of wells, generally located in the central western portion of the reservation. A limited groundwater investigation was conducted by Ninyo and Moore and is dated October 22, 1999. The report documents that a total of 9.4 million gallons were produced from 5 wells on the Reservation during the month of September 1999. Since that time, a major expansion has been occurring on the site. The gaming facility is being increased to 293,000 square feet, with a hotel complex and 18-hole golf course. The report documents that since a wastewater treatment plant will recycle water onto the golf course then the net water use, as a result of the project, will decrease slightly. This conclusion is extremely unlikely. The net consumptive use of water on the project will substantially increase as a result of the current expansion and golf course development. (The net consumptive water demand is the loss of water due to human activities. This also includes evaporation losses from the golf course.) Current water use is not known for the facility. However, the existing and proposed development includes a 750,000-gallon per day wastewater treatment plant. The water treated through the system is to be used on the golf course. This implies that up to a maximum of 750,000 gallons per day could be used within the commercial and gaming elements of the project. This value would be equal to 840 acre-feet on an annual basis.

The County has little information regarding current groundwater conditions on the reservation. Current production data, well locations and resulting water levels are not known (outside of the earlier report by Ninyo and Moore). Over the last several months a number of complaints have been received from neighboring residents regarding decrease well yields and dry wells. Groundwater Geologists from the Department of Planning and Land Use have identified and monitored a number of wells within the area. A water level flow contour map has been constructed showing groundwater flow directions in the area (Figure 3-3). The map indicates a number of groundwater subbasins in the area. The northern portion of Old Barona Road flows north into the greater Barona watershed whereas the central and southern areas of Old Barona Road flow southwest.

A number of residents are also reporting dry wells in the area, (these wells are also shown on Figure 3-3). It is not known conclusively if these wells are impacted by the current water withdrawal on the reservation. Without specific data from the reservation it is impossible to draw a conclusion on the relationship between the Reservation withdrawals and the neighboring dry wells. The neighbors report that their wells were affected during the same time as when the golf course was being constructed. However, without specific data on the withdrawal amounts and resulting water levels on the reservation a definite correlation cannot be drawn.

Sycuan Gaming Facility

The watershed tributary to the Sycuan Reservation is approximately 3,800 acres, in which about 380 acres are trust lands held in trust for the Sycuan Band. The United States Geological Survey (USGS) in 1977, (Open File Report 77-289), studied the Reservation. The conclusion stated within the report, page 12 is as follows:

“Large-capacity wells cannot be drilled on the Sycuan Indian Reservation because of the thinness of saturated alluvial fill. The alluvial fill at the reservation well field is 26 feet thick. The static water level declined from 1 ft below land surface to 26 ft below land surface between 1939 and 1976. Because of this, yield has dropped from 70 gallons per minute to less than 20. Drilling several small-capacity wells would not be sufficient for a large-scale irrigation project on the reservation.”

Overall the USGS report concludes that groundwater resources are very restricted for the Reservation.

The reservation is characterized by steep hillsides of fracture crystalline rock. The only exemption is in the western one fourth of the Reservation that is located within the drainage course called the North Fork of the Sweetwater River. Groundwater storage is limited due to the thinness of saturated alluvial as identified within the USGS report. Imported water is not available in the area and is extremely unlikely to become available in the future. Thus the Reservation and the surrounding private lands are groundwater dependent. Average annual precipitation for the area is approximately 15 inches per year.

Water demand on the Reservation is not known. However the casino facility has a wastewater treatment plant that has a capacity of 150,000 gallons per day. At full capacity the treatment plant would process 168 acre-feet per year. It is very unlikely that this is the current actual production of the onsite wells. However, the proposed size of the plant gives a likely order of magnitude of groundwater production that is occurring on the Reservation. Irrigation needs for landscaping are likely met with treated wastewater, while water demand from wells is likely for commercial, gaming, restaurants, and domestic needs on the Reservation.

No specific data is available on the number of wells, location of wells, extraction rate or resulting water levels on the Sycuan Reservation. Thus it is impossible to state that adverse groundwater impacts are being produced as a result of the activities. However, due to the known limited storage capacity of the aquifer and the likelihood of major production

occurring on the facility, it is reasonably possible that adverse groundwater impacts are occurring off the Reservation.

Viejas Gaming Facility

The facility, located just east of Alpine is also groundwater dependent. The Reservation covers 1,609 acres, and lies within a watershed of about 5,000 acres. The watershed is generally composed of steep hillsides of fractured crystalline rock that drain down onto the Viejas valley floor. The valley floor has a very limited amount of saturated alluvium overlying crystalline rock. The watershed drains toward the southwest in Viejas Creek and into Loveland Reservoir, located in the upper Sweetwater Watershed. As in most areas of the County, groundwater storage is severely restricted due to the low amount of saturated alluvium and limited storage capacity of crystalline rock. Average annual precipitation for the basin is 18 to 21 inches per year.

The water supply for the facility is obtained through on-site wells located to the north and northeast of the gaming complex and located in the middle of the valley floor. No data is available on the production rate or quantity, or the resulting water levels. A number of private residents adjoin the Reservation on the south and southwestern sides. These residents are also groundwater dependent and use wells for all water requirements.

The casino facility has a wastewater treatment plant that has a capacity on 130,000 gallons per day. At full capacity the treatment plant would process 145 acre-feet per year. It is very unlikely that this is the current actual production of the on-site wells. However, the size of the plant gives a likely order of magnitude of groundwater production that is occurring on the Reservation. Irrigation needs for landscaping surrounding the facility are likely met with treated wastewater, while water demand from wells is likely for commercial, gaming, restaurants, and domestic needs on the Reservation.

Overall, Viejas valley has a significant groundwater resource due to the size of the watershed. However a large amount of groundwater production could deplete the resource due to restricted storage within the basin. If off-site impacts were to occur they would affect adjoining private residents to the south and southwest of the Reservation. Overall, water demands for commercial and gaming requirements can probably be met by the aquifer. However any additional development of golf courses and hotel complexes could be very adverse to the groundwater resources of the basin.

Proposed Facilities

Barona Expansion

The expansion of the Barona Casino complex includes a hotel facility and an 18-hole golf course. In particular the irrigation demands of the golf course will likely be adverse to the groundwater resources of the greater Barona watershed. (See discussion above on the existing facility). Even though the groundwater report states that the irrigation demand for the golf course will be met with treated wastewater it is likely that the net increase in consumptive use demand for the golf course will be impactive to the watershed. Currently, the existing wells are concentrated in the north central portions of the valley floor. It is

likely that in the future the well field will need to be expanded toward the northeast to spread out the groundwater production influence.

Jamul Gaming Facility

This facility has access to imported water from the Otay Water District. Thus groundwater is not anticipated to be used and no impacts to the groundwater resources are likely. Neighboring residences also have imported water. A few wells are in the area, however no adverse impacts are anticipated as a result of this proposed facility.

Pala Gaming Facility

The Pala Gaming Facility is located within the middle portion of the San Luis Rey River system. The watershed tributary to the Reservation is very large and includes Palomar Mountain and the Warner Springs Basin. Overall, steep slopes of fractured crystalline rocks draining down to the San Luis Rey River characterize the watershed. The flanks of the watershed have restricted groundwater resources due to limited groundwater storage of the fracture crystalline rocks. However, the saturated alluvium within the river system has a large storage capacity and is known to produce very high capacity water wells. Significant groundwater production is currently occurring within the watershed for several water districts and irrigation demands for tree crops. Average annual precipitation within the watershed varies from a low of 15 inches in the lower western portions of the watershed to as high as greater than 45 inches on Mt. Palomar. Precipitation at the Reservation averages approximately 17 inches per year.

The Pala Facility is planning a wastewater treatment plan with a maximum capacity of 263,000 gallons per day. All irrigation demand will likely be met with treated wastewater. No adverse off-reservation impacts to groundwater resources are anticipated due to the location and size of the Reservation (10,754 acres) and the size of the watershed tributary to the facility. The area surrounding the casino complex has a thick section of saturated alluvium and is capable of producing high capacity wells. Even though the Reservation is groundwater depend, with no access to imported water, it is unlikely to produce adverse groundwater impacts.

Rincon Temporary and Permanent Gaming Facility

The Rincon Gaming Facility is located within the upper portion of the San Luis Rey River system. This watershed is the same as described for the Pala Gaming Facility above.

The Rincon Facility is planning a wastewater treatment plan with a maximum capacity of 180,000 gallons per day. All irrigation demand will likely be met with treated wastewater. No adverse off-reservation impacts to the groundwater resources are anticipated due to the location and size of the Reservation (3,932 acres) and the size of the watershed tributary to the facility. The area surrounding the casino complex has a thick section of saturated alluvium and is capable of producing high capacity wells. Even though the Reservation is groundwater depend, with no access to imported water, it is unlikely to produce adverse groundwater impacts.

San Pasqual Temporary and Permanent Gaming Facility

The San Pasqual Gaming Facilities are located within the Woods Valley area on 4 parcels totaling 1,379 acres. Overall, steep slopes of fractured crystalline rocks draining down to Valley Center characterize the Reservation and tributary watershed. The southern parcel drains toward the south and into Lake Wohlford. Generally, the watershed has restricted groundwater resources due to limited groundwater storage of the fracture crystalline rocks. Most of the lower portions of the watershed are served by imported water via the Valley Center Water District. The Reservation has access to imported water from the District, however they also plan to use groundwater. The valley floor of Woods Valley has a limited amount of saturate alluvium. However the majority of groundwater production in the watershed is from the underlying fractured crystalline rock aquifer. Annual precipitation within the watershed averages approximately 18 inches per year.

The San Pasqual Facilities are planning a wastewater treatment plan with a maximum capacity of 195,000 gallons per day. All irrigation demand will likely be met with treated wastewater. The Tribe is beginning a \$2.6 million upgrade to their water delivery system. This plan will include several new wells and 6.3 miles of pipelines. The location of the new wells, potential yield and possible impacts are not known. With imported water in the area it is possible to mitigate potential adverse impacts to the groundwater system with additional water supplies provided from the District. In summary, since no information is available on the new facilities it is impossible to predict if off reservation impacts could occur. However, with imported water in the area, and on the Reservation, potential mitigation measures are possible if a future groundwater overdraft condition were to occur.

Anticipated Facilities

No data is available to evaluate either the scope or potential impacts to the groundwater resources from the facilities discussed below. The enclosed discussion is only based on known geological and hydrological conditions on, and surrounding, the reservations.

Campo Gaming Facility

The Campo Reservation covers 15,480 acres and lies in the southeastern portion of the County. This area of the County is groundwater dependent with no access to imported water and no potential for getting imported water in the future. The Reservation lies on a fractured crystalline rock aquifer with little saturated alluvium. Overall, well yields are limited due to the lack of saturated alluvium and groundwater storage is also very small due to restricted conditions of the fracture rock aquifer. Precipitation on the Reservation is 15 to 18 inches per year.

Even though the Reservation has no imported water, potential adverse impacts to the groundwater resources surrounding the Reservation are unlikely. This is due to the size of the Reservation, and the fact that any future wells will likely not be close to any private wells surrounding the Reservation.

Ewiiapaayp Gaming Facility

A potential casino developed by the Ewiiapaayp Tribe could be located near the Viejas Reservation. (For additional information regarding the hydrogeologic conditions in this area please see the above discussion on the Viejas Casino). Since off-reservation impacts are possible in the Viejas Valley, additional development in this valley could be adverse to the groundwater resources of the basin. This is especially true considering that private homes (that are groundwater dependent) lie adjacent to the Viejas Reservation. Additional development in this area is of concern and would likely produce off-reservation impacts.

La Jolla Gaming Facility

The La Jolla Reservation covers 7,957 acres and lies in the northern portion of the County. This area of the County is groundwater dependent. The Reservation lies in an area characterized by steep slopes composed of fractured crystalline rock aquifer with no little saturated alluvium. The upper reaches of the San Luis Rey River run through the Reservation. However, this reach of the river has little to no saturated alluvium. Overall, well yields are limited due to the lack of saturated alluvium and the fact that groundwater storage is also very small due to restricted conditions of the fracture rock aquifer. Precipitation on the Reservation is 21 to 24 inches per year. Even though the Reservation has no imported water potential adverse impacts to the groundwater resource surrounding the Reservation are unlikely. This is due to the size of the Reservation and the fact the any future wells will likely not be close to any private wells surrounding the Reservation. Due to the rural nature of the area adverse impacts are not anticipated to occur to the groundwater system from a potential casino.

Manzanita Gaming Facility

The Manzanita Reservation covers 3,579 acres and lies in the southeastern portion of the County. This area of the County is groundwater dependent with no access to imported water and no potential for getting imported water in the future. The Reservation lies on a fractured crystalline rock aquifer with little saturated alluvium. Overall, well yields are limited due to the lack of saturated alluvium and groundwater storage is also very small due to restricted conditions of the fracture rock aquifer. Precipitation on the Reservation is 15 to 18 inches per year.

Even though the Reservation has no imported water potential, adverse impacts to the groundwater resource surrounding the Reservation are unlikely. This is due to the size of the Reservation, and that any future wells will likely not be close to any private wells surrounding the Reservation, and the rural nature of the adjacent area.

Pauma Gaming Facility

The Pauma Reservation consists of two parcels totaling 5,877 acres and lies in the northern portion of the County at the western edge of Mount Palomar. Precipitation on the Reservation is 18 to 24 inches per year. The northern parcel lies along the edge of the Mountain and is generally inaccessible. The northern parcel lies in an area characterized by steep slopes composed of fractured crystalline rock aquifer with no saturated alluvium.

Overall well yields on this parcel would be very limited due to the lack of saturated alluvium and the fact that groundwater storage is also very small due to restricted conditions of the fracture rock aquifer.

The southern, smaller parcel lies on the alluvial fan at the base of the Mountain, in an area of the watershed where saturated alluvium exists. A number of high production wells do exist in this area. Imported water is brought into this area of the watershed, however is not available to the Reservation. Agricultural production for tree crops produces significant quantities of groundwater within this area of the County. When compared to the existing groundwater production in this watershed the development of a casino at this location is not anticipated to have significant adverse impacts to the aquifer.

3.12.2.2 Cumulative Impacts

Cumulative impacts are possible from the following casinos: 1) Viejas and Ewiiapaayp in eastern Alpine, and 2) Pala, Pauma, La Jolla, and Rincon along the San Luis Rey River. All other existing and proposed casinos are not anticipated to have cumulative impacts to the groundwater resources.

Viejas and Ewiiapaayp

Additional development in the Viejas Valley could be cumulatively impactful to the groundwater resources. Private residents located to the south of the Viejas Reservation could be adversely impacted as a result of expanded groundwater development in the Viejas Valley.

Pala, Pauma, La Jolla, and Rincon

All four of these casinos are located within the San Luis Rey watershed. All would produce their water supply from this one groundwater system. However cumulative impacts are not likely because of the size of the watershed and quantity of water within the aquifer. The watershed currently supports a large number of large capacity wells, and the addition of four casinos is not likely to significantly increase the current quantity of groundwater production that is occurring in the watershed.

3.12.3 Conclusions and Recommendations

The development of water intensive uses within the rural areas of the County can have adverse impacts to the underlying groundwater resources. This is especially true for the Barona, Sycuan, and Viejas Reservations. Generally the gaming facilities do not require significant amounts of waters. However associated facilities such as golf courses are very water intensive. In areas that are groundwater dependent a groundwater overdraft condition can have long lasting and significant environmental impacts that could impact the health and safety of neighboring residents.

County staff recommends that:

- 3-28 The County should work with the Indian Tribes so that data can be gathered on and around the reservations in order to evaluate long-term impacts from the water

production. A network of monitoring wells, similar to the monitoring network established around the Barona Reservation, should be established near the Sycuan and Viejas Reservations. These networks would assist in the determination if adverse impacts were occurring in areas surrounding these reservations.

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OLD BARONA ROAD AREA

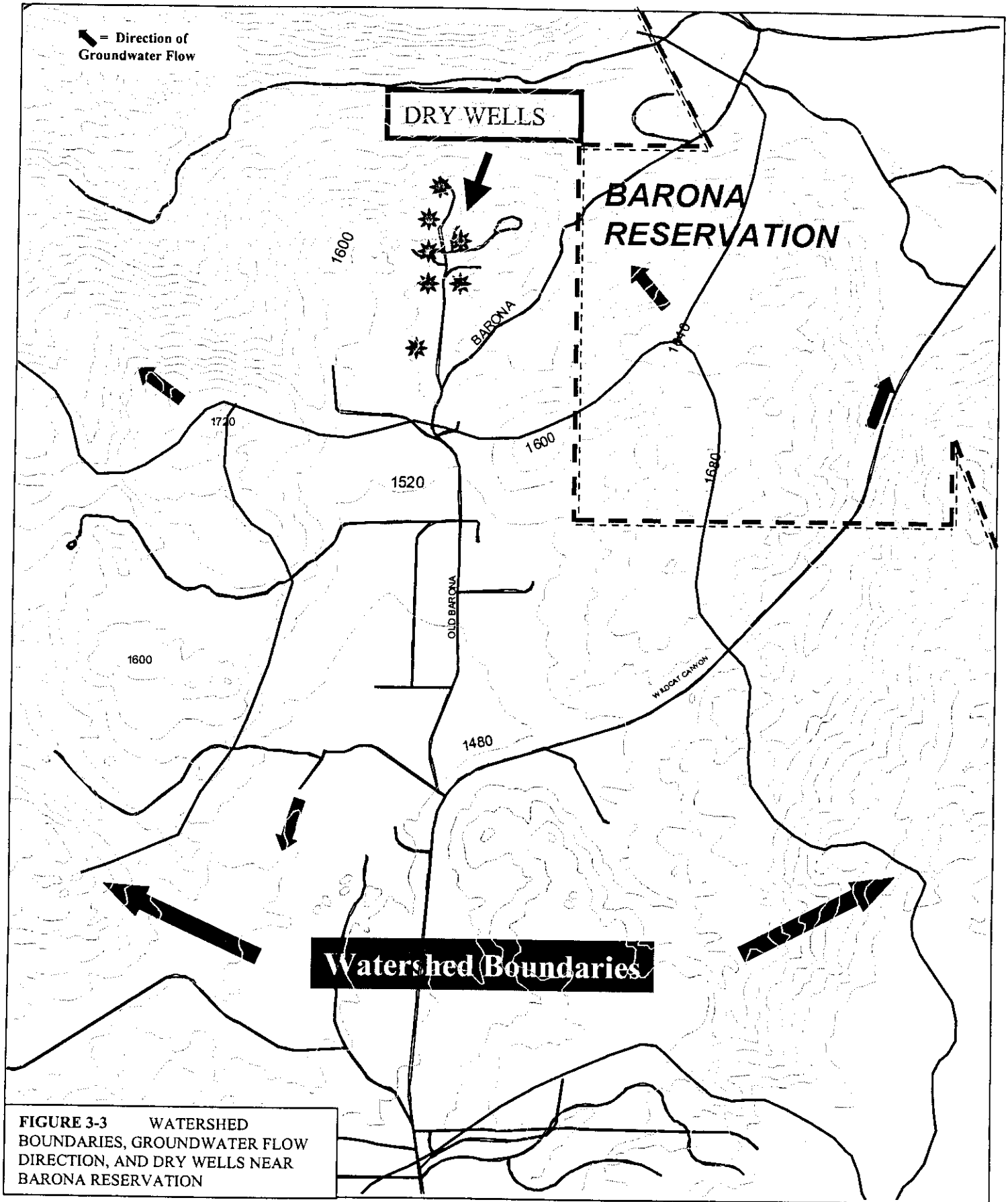
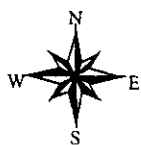
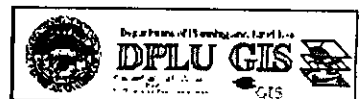


FIGURE 3-3 WATERSHED BOUNDARIES, GROUNDWATER FLOW DIRECTION, AND DRY WELLS NEAR BARONA RESERVATION



Watershed Boundaries
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Chapter 4

Other Anticipated Impacts and Issues

4.1 *Economic Impacts*

4.1.1 Analysis of Potential Impacts

4.1.1.1 Self-Sufficiency

Indian gaming can have both positive and negative economic impacts on quality of life on the reservations. The economic conditions on reservations without gaming facilities are typically depressed and have a low standard of living. On these non-gaming reservations, such as Los Coyotes, poor housing conditions and lack of adequate infrastructure are major impediments to economic development and self-sufficiency.

Anthony Pico, Chairman of the Viejas Band of Kumeyaay Indians, relayed the following while testifying before the Subcommittee on Indian Gaming as reported in the National Gambling Impact Study Commission:

“Our gaming revenues provide such government services as police, fire and ambulance to our reservation, neighbors and casino. Earnings from gaming have paved roads, provided electricity, sewage lines, clean water storage, recycling, trash disposal, natural habitat replacement, and watershed and other environmental improvements to our land.”

It is apparent that Indian gaming has improved the standard of living for those on the gaming reservations and in some cases for neighboring reservations through shared gaming revenue.

Tribal sharing of gaming revenue has offered some of the non-gaming tribes a means to improve their standard of living. Los Coyotes will upgrade its water supply and improve the quantity and quality of the housing on the reservation. Mesa Grande describes the reservation as an economically “depressed situation”. Historically, Indians on the Mesa Grande reservation have attempted to become self-sufficient through the raising of livestock, however, that has not dramatically improved their standard of living. The major source of income for the tribe is the revenues received from gaming earned by other tribes.

There is also an opportunity to use revenues to diversify the employment opportunities on the reservations. The National Indian Gaming Commission recommended that “tribal governments should be encouraged to use some of the net revenues derived from Indian gaming as ‘seed money’, to further diversify tribal economies and to reduce their dependence on gambling.” For example, Viejas has built an outlet center, and began, this year, to offer entertainment, while Barona is planning to build a hotel and a golf course as part of their resort facilities.

4.1.1.2 Increased Job Base

Development on the reservations has brought economic prosperity to the tribe and increases the job base for surrounding areas. This can be beneficial both for the tribes and the County of San Diego. The National Gambling Impact Study Report (NGISR) contains a recommendation that "casino development should be targeted for locations where the attendant jobs and economic development will benefit communities with high levels of unemployment and underemployment and a scarcity of jobs for which the residents of such communities are qualified." The proposed casinos in areas of the County where employment opportunities are few fits the model recommended by the NGISR.

The NGISR goes on to indicate that casinos with resorts "create more and better quality jobs". This type of development is consistent with the proposals for San Pasqual, Pala, Rincon and Barona.

In California, Indian casinos employ an estimated 14,571 residents, 90% of whom are not Indians (Source: Economic and Fiscal Benefits of Indian Gaming in California prepared by Analysis Group/Economic Inc.). It is further estimated that another 33,800 jobs in California are created from goods and services supporting gaming operations. This includes construction, vendors and service providers.

In San Diego County, the number of jobs created by the three existing casinos is as follows:

- Barona 1,500 jobs
- Sycuan 1,800 jobs
- Viejas 2,283 jobs

Anticipated jobs created by the new casinos are as follows:

- Pala 1,300 jobs
- Rincon 1,200 jobs
- San Pasqual 1,600 jobs
- Barona Expansion 700 jobs

The jobs created by Indian gaming can have a positive effect on the job base for both those living on the reservation and non-Indians living in the nearby communities. They can also provide entry-level jobs for those on welfare. Group Economics estimated in a report titled "The Economic & Fiscal Benefits of Indian Gaming in California" that Indian gaming is responsible for reduced AFDC payments by \$50 million including \$21 million to tribe members and \$29 million to former recipients through jobs created by Indian gaming.

4.1.1.3 Fiscal Impact

Positive Impacts

"The Economic & Fiscal Benefits of Indian Gaming Report" created by Group Economics suggested that Indian gaming would produce approximately \$114.5 million in State and local tax receipts, including:

- \$36 million in State personal income
- \$23.6 million in State Corporate tax

- \$48 million in State and local use tax
- \$5 million in other taxes and payments.

It is safe to assume that the charitable activities of the tribes have a positive impact on the region. The Sycuan, Barona and Viejas tribes have given over \$5 million annually to charity and community organizations.

Negative Impacts

Further study is needed to determine the negative impacts resulting from Indian gaming and other development on the reservations. Building and running gambling facilities typically doesn't create wealth - it transfers it. Consumers have an established amount of money budgeted for entertainment. If the consumer spends his/her entertainment budget at non-taxable venues the County may realize a reduced amount of tax. Casinos can hurt the local economy if consumers go to casinos instead of a local taxable business. Indian casinos were debatably held partially responsible when sales tax revenue fell below projections in the State of Arizona.

Development of Indian reservations can also hurt local businesses. Businesses located on Indian reservations may be able to offer goods and service at what may be perceived as an unfair competitive advantage because they do not typically have the same overhead as it relates to rental rates. Atlantic City reported a 40% drop in restaurant patronage when casino were legalized. Furthermore, Gary Andrews, Ph.D., testifying before the National Gaming Impact Study Commission substantiates that claim and stated that leakage from taxable sectors such as restaurants and bars occurs and goes to non-taxable gaming establishments.

At the Indian Gaming Conference held September 20,2000 one of the tribal leaders questioned this theory and asked if ConVis had been contacted regarding the amount of casino visitors from outside the region. The implication is that tourists who are visiting casinos would spend additional money at local taxable establishments. Currently ConVis does not have data to reflect the point of origin for tourists visiting casinos. OTBD has requested ConVis to modify the next tourist profile to include a question to query tourists to determine if they came here to visit casinos. ConVis is scheduled to do the next survey in 2002. There is an opportunity to target visitors from out of the region and introduce new wealth into the region.

4.1.1.4 Cumulative Impacts

Tribal businesses have been an important asset for the County's CalWORKs program, providing CalWORKs Welfare-to-Work participants with a variety of entry level job opportunities, as well as opportunities for advancement, at casinos, factory outlet centers, restaurants, gift shops and other types of businesses. As existing casinos and other businesses expand, and new ones are developed, additional employment opportunities will be created that could benefit CalWORKs participants.

4.1.2 Conclusions and Recommendations

The County has had a positive working relationship with tribal businesses relative to employment of CalWORKs Welfare-to-Work participants. Continuation of this relationship will be important to ensure that CalWORKs families seeking to achieve self-sufficiency can benefit from tribal economic development activities. Areas of particular interest include job opportunities in rural North County, as well as ways in which tribal businesses can help to address transportation and child care needs for CalWORKs participants they employ. Transportation and childcare are significant barriers to employment for many CalWORKs recipients.

In summary, there is not adequate information to conduct a cost benefit analysis. However, there are a variety of actions the County can take to increase the potential positive economic impact from tribal gaming. Those recommendations are as follows:

- 4-1 The County should develop an agreement with the Tribes to hire local supplies and service providers. This will keep the secondary jobs within the region and allow these companies to earn taxable income and provide additional local jobs.
- 4-2 The County should enter into a revenue sharing agreement that allows for some of the forthcoming revenue to be directed toward necessary support services and infrastructure.
- 4-3 The County should work with the Tribes in developing a joint marketing plan that is directed toward recruitment of outside visitors to the casinos.
- 4-4 The County should request the casinos market nearby tourist support businesses to direct visitors to taxable sources.
- 4-5 The County should encourage Tribes to diversify their economy through other non-gambling business ventures.

4.2 Revenue

Based on information California Tribes submitted to the Legislative Analyst's Office for the analysis of Proposition 5, California tribes earned over \$600 million from gambling in 1997.

4.2.1 Tribal – State Gaming Compacts

The Tribal-State Compacts between the Tribes and the State of California contain certain provisions to collect revenue from the gaming activities. Two Funds have been created, one to share revenue from gaming with non-gaming Tribes and one to pay for the cost of the State's enforcement of the provisions of the Compact and to address the impacts to the State and local government.

4.2.1.1 Background

Revenue Sharing Trust Fund

The Revenue Sharing Trust Fund was created by the Legislature and administered by the California Gambling Control Commission, as Trustee. Each Gaming Tribe is required to pay quarterly into the Fund, paying per Device per Annum according to the following schedule: \$900 for 351 – 750 licensed devices, \$1,950 for 751-1250 licensed devices and \$4,350 for 1251-2000 licensed devices. Each Non-Gaming (i.e. Non-Compact) Tribe is to receive \$1.1 million per year, disbursed quarterly.

Special Distribution Fund

The Special Distribution Fund was created and appropriated by the Legislature. The Fund is to be based on to the number of Gaming Devices operated by the Tribe on September 1, 1999. Each appropriate Tribe will pay a percentage of average gaming device net win, starting at 7% for 201-500 number of terminals in quarterly device base. The quarterly device base will be calculated based on the total number of all Gaming Devices operated during a given quarter.

It is the intent of the parties that Compact Tribes will be consulted in the process of identifying purposes for grants made to local governments. The Fund will be available for the following purposes:

1. Grants, including any administrative costs, for programs designed to address gambling addiction;
2. Grants including any administrative costs, for the support of state and local government agencies impacted by tribal government gaming;
3. Compensation for regulatory costs incurred by the State Gaming Agency and the state Department of Justice in connection with the implementation and administration of the Compacts;
4. Payment of shortfalls that may occur in the Revenue Sharing Trust Fund; and
5. Any other purposes specified by the Legislature.

The first transfer into the Fund will take place at the conclusion of the first calendar quarter following the second anniversary date of the effective date of Compact. Per Section 11.1 of the Compact, the anniversary date of the Compacts is May 16, 2000 for Barona, Campo, Ewiiapaayp (Cuyapaip), Jamul, La Jolla, Manzanita, Pala, Rincon, San Pasqual, Sycuan and Viejas Tribes. That is the date that the Compacts were published in the Federal Register.

4.2.1.2 Issues related to Special Distribution Fund

- Sec. 5.1. (a) of the Compact appears to limit the contributions to the Fund to revenue generated from gaming devices operated by a Tribe on September 1, 1999. This flies

in the face of common sense, as the purpose of the Compacts was to address new or expanded casinos, i.e. Class III gaming facilities built after September 1, 1999.

- Section 5.1. (b) of the Compact states that the first transfer to the Special Distribution Fund by the Gaming Tribes shall be made at the conclusion of the first calendar quarter following the second anniversary date of the effective date of the Compact. This means that no transfer of revenue would take place until July 2002, a date that would cause the transfer to happen past the budget process and may delay the Legislature allocating the money in the Fund until, at the earliest date, January 2003, or during the budget cycle for FY 2003/2004.
- Any funds that the County may be able to apply for and receive from the Special Distribution fund will not be available until after the impacts to the road infrastructure need to be partially or fully mitigated.
- The process and procedures to apply for grants has not yet been set up.
- The Compact provisions do not address the issue of fair share, i.e. the fact that the County of San Diego will experience more impacts than any other County in the State. If all proposed casinos in San Diego do in fact open and are successful, it is very possible that their transfers to the Fund will proportionally exceed the transfers from other casinos in the state. The Compact provisions are silent about returning money to counties based on the proportional amount of contributions made in each county.
- In addition to the aforementioned issues, of the five purposes for which the Fund was created, only one specifically mentions local governments, thereby making it uncertain how much money the County of San Diego will be able to obtain from the Fund.

4.2.2 Conclusions and Recommendations

- 4-6 The Board should send a letter to Governor Davis asking for the intent and interpretations of the provisions of the Compacts, which staff identifies as not being clear.
- 4-7 The Board should instruct its Sacramento Representative to work with the Administration and other interested parties to secure maximum funding available for the County of San Diego through the budget or grant process.
- 4-8 To expedite the grant process, the Board should develop agreements with the local Tribes, which specify for which purposes the Tribes would support grants from the Fund to the County.

4.3 Taxation

4.3.1 Background

4.3.1.1 Federal Income Tax

As governmental entities, tribal governments are not subject to federal income taxes. IGRA requires that the revenues generated by Indian gambling facilities be used for tribal governmental services and for the economic development of the tribe. To the extent that the revenues are used for these purposes, they are not subject to federal taxes. The major exception concerns per-capita payments of gambling revenues to eligible tribal members. According to IGRA, if any gambling revenues remain after a tribe's social and economic development needs have been met, and its tribal government operations have been sufficiently funded, then per-capita distributions can be made to eligible tribal members, if approval is granted by the Secretary of the Interior. Individuals receiving this income are then subject to federal income taxes as ordinary income. No information is available on the revenue generated from this tax.

4.3.1.2 State Income Tax

State income taxes do not apply to Indians who live on reservations and who derive their income from tribal enterprises. State income tax does apply to non-Indians working at Indian casinos, and to Indians living and working off the reservations, as well as to those Indians who live on reservations but who earn their income at non-tribal operations off the reservations. No information is available on the revenue generated from this tax.

4.3.1.3 Sales Tax

California Sales and Use Regulation 1616 (3) A specifies the following:

- A. Sales tax does not apply to sales of tangible personal property made to:
 - 1. Indians by Indian retailers on Indian reservations if the purchaser resides on a reservation, and if the property is delivered to the purchaser on a reservation.
 - 2. Indians to non-Indians, and Indians who do not reside on the reservation, if the sale is made on the reservation, and if the property is delivered to the purchaser on the reservation.
 - 3. Sales by non-Indians to Indians who reside on a reservation when the sale is made on a reservation, and if the property is delivered to the purchaser on the reservation.
- B. Sales tax does apply to sales of tangible personal property made on a reservation by non-Indians to non-Indians and Indians who do not reside on a reservation.

The vast majority of sales at the Viejas Outlet Center are made to non-Indians. Consequently, they fall under Category B and are taxable. A very small percentage (less

than 1%) is made to Indians who live on the Viejas Reservation. Generally, when sales are made to these individuals, an identification card is presented and a sales tax exemption is granted by the store.

At present time, the only revenue generated by sales taxes that can be directly attributed to businesses on the reservations comes from the Viejas Outlet Center. In 1998/1999, the County's share of sales tax revenue collected by Viejas Outlet Center businesses was \$333,959; in 1999/2000, the County's share was \$352,808. All other businesses presently operating on reservations are not subject to sales tax because they do not fall under Category B, as described above.

4.3.1.4 Property Tax

Land held in trust by the United States Government for the Native Americans is non-taxable for property tax purposes. Generally, all of the commercial enterprises such as casinos, shopping areas, golf courses etc., have always been built only on land held in trust, therefore there is no direct property tax on the land or improvements. Whenever a Tribe applies to the Department of Interior, Bureau of Indian Affairs, to place Assessor Parcels in trust by the United States of America, a letter is sent to the County seeking comments on the potential impacts, which may result from the removal of the subject property from the tax roll and local jurisdiction. Whenever such requests have been reviewed by the Assessor's office, the direct loss in property taxes has been assessed. Since the lands in question are undeveloped, the direct loss to the County of the amount of revenue has been found to be minimal. To date, the approval to place lands in trust has resulted in a \$28,335 loss in property tax revenue to the County.

4.3.1.5 Taxable Possessory Interest

The only property tax that may be collected by the County on lands held in trust is for "possessory interests" in real property held by non-Indians. A taxable possessory interest (PI) is created when a private party is granted the exclusive use of real property owned by a non-taxable entity. Under State law, possessory interests must be assessed for property tax purposes. The PI may be conveyed by a lease, permit, contract, or only a verbal agreement. Essentially, the possession or right to possession of the real property is what creates a possessory interest; not the type of document used to convey that right. The possession must be **independent, durable, and exclusive** of the rights held by others. It must also provide a private benefit to the possessor above that which is granted to the general public. Examples of possessory interests include such things as:

- Boat slips on public lakes, ocean marinas, or rivers.
- A mini-storage facility built under a freeway.
- Fast-food facilities on military installations.
- Cattle grazing rights on federal or state land.
- Concessionaires and exhibitors at convention centers and fairgrounds.

- Cabins on U.S. Forest owned land.
- Public golf courses leased to private operators.
- Airline terminal and cargo space at large metropolitan airports.
- Container operators at major harbors.
- Cable television right-of-way easements.
- Government-supplied employee housing.

The lessee who acquires the possessory interest must pay the property taxes. The private possessor receives the services and benefits (fire and police protection, schools, and local government) that other similar taxable properties enjoy. The PI tax helps to pay the holder's fair share of those costs.

The Assessor's Office has assessed a possessory interest at the Viejas Outlet Stores because each store is leased to non-Indians. Each store leases the location and runs their business independently for their own profit, makes all of the decisions to hire and fire employees and sets their own prices etc.

The valuation of PI's differs significantly from other forms of property tax appraisal, as shown below:

- The Assessor must value only the legally permitted possessory interest use under the agreement.
- The Assessor must not include the value of the lessor's retained rights in the property, as that interest is exempt.

4.3.2 Analysis of Impacts

Although the Assessor's Office, with the assistance of County Counsel, will continue to review any agreements between the tribes and third parties, it is unlikely that a casino, golf course, or hotel will be subject to a possessory interest. This is based on reviewing leases and contracts in San Diego County and well as throughout the State. The tribes are very unlikely to lease the land to a developer and have the developer build and operate the facility. Even if the tribe enters into a management contract to run the day-to-day operations, the tribe typically has the final say in most important decisions and retains the majority of the profits; therefore several elements (as discussed above) are lacking to establish a possessory interest.

4.3.3 Conclusions and Recommendations

The best chance for the County to generate revenue to meet the costs of providing services may be to establish a voluntary "in lieu" fee. Such a voluntary fee could be based on the improvements made on the reservations that have been identified in this Report as having impacts, which require funding in order to be mitigated. Since the majority of property tax

revenue (over 60%) goes to schools rather than property-related services, the Board may want to encourage the tribes to voluntarily contribute a portion of their revenue comparable to the amount of property tax that is collected on taxable properties for property-related services. Such a contribution would help offset some of the initial as well as the ongoing costs of providing services. As such, staff makes the following recommendation:

- 4-9 The County should encourage the Tribes to contribute a fair portion of the improvements on the reservations to pay for property-related services.

4.4 “In Trust” Lands And Off-Reservation Gambling

4.4.1 Background

4.4.1.1 “In Trust” Lands

Various Federal statutes authorize the Secretary of the Interior to acquire title to land on behalf of the United States of America for the benefit of Indian tribes. The applicable regulations governing such acquisitions are set forth in the Code of Federal Regulations, Title 25, Indians, Part 151. As set forth in the cited regulation, it is the Secretary’s policy to accept land “in trust” for the benefit of tribes, provided such lands are within the interior boundaries of the tribe’s reservation, or adjacent thereto, and when the Secretary determines that the land is necessary to facilitate tribal self-determination, economic development, or tribal housing. Additional discretionary authority is exercised considering the factors of:

1. The need of the tribe for additional land;
2. The purposes for which the land will be used;
3. The impact on the State and its political subdivisions resulting from removal of the land from the tax roll; and
4. Jurisdictional problems and potential conflicts of land use which may arise.

Land acquisitions by Indian tribes for non-gambling purposes have been largely focused on reclaiming former reservation land that was alienated in the past and is deemed necessary for the economic and social benefit of the tribe.

Since 1995, the Department of Planning and Land Use has reviewed and commented to the Bureau of Indian Affairs on seven applications from four Indian bands to take land “in trust” for the individual Bands. The applications reviewed to date are as follows:

4.4.1.2 Sycuan Band

- Total 57 acres. Use 7.6 acres of this parcel as overflow parking for the Casino. The remainder of the property will retain existing uses of a single-family residence, a mobile home, a modular classroom, storage sheds, a modular building used for Tribal administration of the Sycuan Tribal Fire Department, and DQ University Satellite Campus, an affiliate of the United Native Nations, an organization dedicated to promoting the continuation and advancement of indigenous peoples.

- Total 20 acres. Continued use of the Big Oak Ranch site as a western themed recreation area.

4.4.1.3 Mesa Grande Band

- Approximately 1,000 acres proposed to be used for buffalo grazing and housing.

4.4.1.4 Pala Band

- Approximately 180 acres proposed for housing and agriculture;
- Approximately 8 acres proposed for housing; and
- Approximately 15 acres proposed for housing.

4.4.1.5 Ewiiapaayp

- Approximately 1.5 acres, adjacent to the 8.78 acre trust parcel site of the Southern Indian Health Council Clinic, for the operation of a Group Home for adolescent girls.

In response to these applications, staff's comments have reiterated that the Board of Supervisors adopted a Resolution on March 29, 1994, urging the Secretary of the Interior to deny designation of "tribal land" to newly purchased land acquired for Indian gaming and related uses. This statement is included even though these lands are not proposed for gaming so that the position is clear should there ever be a proposed change of use to include gambling facilities.

The responses have also expressed the County's concerns that the loss of jurisdictional control could lead to incompatible activities on the trust lands with adverse impacts on the surrounding communities.

In instances where housing was indicated as the proposed use, staff have commented that the proposed use would not be incompatible with the adjacent General Plan and Zoning designations but that issues such as community character, density, environmental resources and groundwater availability should be considered.

With the exception of the proposed use of 7.5 acres for overflow parking for the Sycuan Casino, none of the formal applications for taking land in trust have been directly related to gambling. However, 8.78 acres of land that was accepted into trust in the name of the Ewiiapaayp Band for the purpose of a health care clinic for the Southern Indian Health Council Clinic in Alpine was recently put forward as a possible casino site. This proposal has met with objections from both the citizens of Alpine and some of the Bands that are served by the clinic. It is yet to be determined if the use of this land for a casino would be allowed under Federal Law. This site is less than a mile from the Viejas casino and could significantly impact the Willows Road offramp from Interstate 8 as well as the character of the area.

Additionally, in July of this year, staff was contacted and asked to provide input and analysis on a proposal to annex 101 acres north and northwest of the 6 acre Jamul reservation for a

potential land trust application and a development proposal which includes 245,000 sq. ft. of casino, a 250 room hotel, 6 food venues, and public and employee parking. The information submitted for review provided very little information as to location or design of the project so staff was able only to point out general areas where additional information was needed and express concerns for the impact of such a facility on the rural character of the community of Jamul.

4.4.1.6 Off-Reservation Gambling

It is possible for an Indian tribe to operate Indian gambling off existing reservation lands. The general rule under IGRA is that no Indian gambling may occur unless it is located on "Indian lands" acquired before the enactment of IGRA in 1988. (25 U.S.C. Section 2710 [b][1], [d][1]). "Indian lands" are "all lands within the limits of any Indian reservation" and "any lands title to which is held in trust by the United States for the benefit of any Indian tribe or individual or held by any Indian tribe or individual..." IGRA prohibits the operation of Indian gambling on lands acquired by a tribe and transferred into trust after its enactment in 1988, with the following exceptions:

- When an Indian tribe was without a reservation when IGRA was enacted and the newly acquired lands in trust are within the boundaries of the tribe's former reservation;
- When an Indian tribe purchases off-reservation lands and transfers them into trust after the enactment of IGRA and it meets certain conditions and obtains certain consents. An Indian tribe is permitted to operate Indian gambling on newly acquired lands that have been transferred into trust and located off an existing reservation when "the Secretary (of the Interior), after consultation with the Indian tribe and appropriate State and local officials, including officials of other nearby Indian tribes, determines that a gambling establishment on newly acquired lands would be in the best interest of the Indian tribe and its members, and would not be detrimental to the surrounding community, but only if the Governor of the State in which the gaming activity is to be conducted concurs in the Secretary's determination;" (IGRA, 1988)
- When an Indian tribe acquires land as settlement of a tribal land claim or its former reservation lands are restored to trust status (IGRA, 1988);
- When an Indian tribe acquires an initial reservation as a part of its Federal recognition under the Federal acknowledgement process.
- In the eleven years since IGRA's enactment, the Bureau of Indian Affairs has reviewed ten applications to operate off-reservation casinos, none of which were in California. Of these, the BIA accepted two. One application was rendered moot by the tribe's decision to use a site that did not require approval; three applications were officially rejected by either the Secretary of the Interior or the state governor; and the remainder, though not officially rejected, apparently are no longer under active consideration, at least in some cases because of the governor's stated opposition (USDOI, 1998).

4.4.2 Analysis of Potential Impacts

Potential impacts are difficult to assess in light of the fact that applications to take land in trust could occur anywhere throughout the County on land surrounding or in proximity to existing reservations. This can create an uncertainty for long range land and infrastructure planning.

Although more difficult to achieve than building on existing reservation, the potential to take additional lands in trust for gaming does exist. The authority to allow these uses is vested in the Secretary of the Interior and the Governor. Their determination of what is in the best interest of the tribe and would not be detrimental to the surrounding community may differ from that of local government. Their decisions will be largely based on the Environmental Assessments prepared by the tribes. To date the Environmental Assessments submitted for expansions and building of casinos have been inadequate in the amount of information presented, have minimized the impacts to adjacent lands, and have provided inadequate mitigations for these impacts.

4.4.3 Conclusions and Recommendations

Staff has the following recommendations with regard to the "In Trust" Lands And Off-Reservation Gambling:

- 4-10 The County should continue to express to the Bureau of Indian Affairs that land acquisitions taken into trust should only be used for the intended purpose stated in the Land Trust Action application submitted to the Bureau.
- 4-11 The County must continue to be consulted by the Secretary of the Interior when Indian Tribes propose to establish gambling on lands transferred into trust after 1988 to ensure that such a proposal would not be detrimental to the surrounding community.
- 4-12 The County should work to increase communication and cooperation between the County of San Diego and the Bureau of Indian Affairs for "in trust" applications and Environmental Assessments. This should include the development of a format and standards for the information to be presented that provides local government with the information needed to make an informed analysis of the actual impacts of the proposals.
- 4-13 The County should cooperatively work with the Tribes to develop a procedure to ensure that jurisdictional problems and potential conflicts of land use that may arise are considered in the decision making and that good faith effort is made to mitigate the environmental and community impacts of gaming facilities.
- 4-14 The County should begin preparation of recommendations for changes needed by local government for submittal to the Governor and legislature in anticipation of the review of the Compacts that is to occur in March of 2003.

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Chapter 5

Conclusions and Recommendations

Tribal gaming has the potential to affect the resources of San Diego County in both positive and negative ways. The new facilities will provide an increased job base in areas of the County where jobs are scarce, and will provide the opportunity for taking people off the welfare rolls. In addition, the new facilities have the potential to provide new tax bases and promote local businesses in the County. However, the development needed to support these facilities has the potential to adversely affect County resources as well. Degradation of level of service on many County roadways will adversely impact such resources as air quality, noise, traffic safety. Further, impacts from lighting and project design could adversely impact visual and wildlife resources, community character, and dark skies. In order to create an adequate balance between the needs of the Tribes and the needs of the residents of San Diego County, staff has concluded that the County must take several actions, including working with the Tribes to further analyze the potential impacts of the proposed facilities on those resources where the extent of impacts could not be determined, and develop agreements to offset any adverse impacts. These recommendations are outlined in previous chapters. The following is a summary of the recommendations outlined in this report:

5.1 Summary of Recommendations Relating to Environmental Impacts

Traffic and Circulation

- 3-1 The County of San Diego should encourage the tribes to coordinate the preparation of a cumulative traffic impact assessment. This assessment should address the issues outlined above. Wherever possible, the County of San Diego should attempt to work with the tribes to ensure that where information is available from the County it can be provided to the tribes in a timely manner, and vice-versa.
- 3-2 The County of San Diego should negotiate with the Tribes to obtain fairshare contributions toward road improvements to roads and highways that are impacted by the proposed Indian Gaming projects. Fairshare calculations for construction costs should be made after the completion of initial studies in order to define the improvement projects, assess environmental constraints and prepare preliminary engineering.
- 3-3 Given the exorbitant costs of needed roadway improvements, the County of San Diego and the Tribes should actively seek State and federal funds to construct needed improvements.
- 3-4 Wherever possible, the County and the Tribes should collaborate on the submission of viable road improvement projects to State and Federal agencies to construct.

- 3-5 General Plan 2020 should examine the arterial and highway corridors in order to ensure appropriate Circulation Element Classification and land use patterns to satisfy a LOS D standard.

Air Resources

- 3-6 In order to adequately assess the impacts from roadway LOS degradation, extensive modeling of those roadways whose LOS is expected to degrade to “D” or below should be undertaken. The County of San Diego should work with the tribes to see that these assessments are prepared, and that they not only address impacts resulting from the traffic increases and level of service degradation, but also assess the viability of traffic improvements that could mitigate impacts.
- 3-7 Recommend that the County encourage local Tribes to work with the EPA in establishing air quality programs on their reservation, and to work with the APCD planners in developing air quality management plans for their tribal lands consistent with the San Diego County RAQS and the current SIP.
- 3-8 County staff, including long-range planning staff from the Air Pollution Control District, should work to assess the viability of the current RAQS and SIP in light of the rapid changes in transportation patterns associated with the development of the gaming facilities.
- 3-9 County staff should work with the tribes to assess the viability of alternative means of transportation to/from the gaming facilities, in an effort to offset traffic level of service degradation, and reduce impacts from associated emissions. Such transportation control measures could then be included in future, triennial updates to the RAQS and SIP.
- 3-10 County staff, in conjunction with the Tribes should work towards obtaining grants from the EPA Tribal Programs to assist in offsetting the costs associated with these studies and developing tribal environmental programs that work in conjunction with existing County programs.

Biological Resources

- 3-11 The County should encourage the Tribes to assist in the preparation of full biological surveys and reports in order to determine the extent of biological impacts which will occur where traffic analyses shows that road widening will be required to compensate for the increased traffic on access roads, including SR 94, Old Highway 80, SR 76, and Sunrise Highway. When significant impacts are identified, these reports should adequately address mitigation measures for each impact.
- 3-12 To account for impacts from associated support facilities located off-reservation, on fee lands within County jurisdiction, comprehensive biological surveys and reports should be prepared according to the County’s Biological Survey Guidelines. Where land falls within the County’s Multiple Species Conservation Program, a detailed

analysis of uses proposed within each type of MSCP designated area and how development will conform to the overall MSCP plan should be required.

Community Character, Visual Resources, and General Plan 2020

- 3-13 The County should work with the Tribes in developing adequate exchange of information regarding facility design details, so that minimal impact to community character and other planning issues will take place.
- 3-14 The County should encourage the Tribes to design their facilities in a manner consistent with the Community Design Guidelines for their area.
- 3-15 The County should encourage the Tribes to become involved in the County's General Plan 2020 process, so that the Tribes interests may be adequately considered during the planning process.

Growth Inducement

No Recommendations have been made for this resource area.

Cultural Resources

- 3-16 The County should work with the Tribes in conducting appropriate cultural resource inventories and evaluations for those areas impacted by off-site improvement projects.
- 3-17 The County should work with the Tribes, or their cultural resource specialist, in identifying and implementing appropriate mitigation to prevent the loss of cultural resources where feasible.

Dark Skies

- 3-18 The tribes are encouraged to use low-pressure sodium lights with shielded fixtures, especially those within Zone A areas, per the County Light Pollution Code. Limited decorative lighting and signage is also suggested.
- 3-19 The County recommends that representatives from tribes located within Zone A areas work together with Dr. Robert Brucato of the Palomar Observatory and Dr. Paul Etzel of the Mount Laguna Observatory. They have both expressed a great deal of interest in collaborating with the proposed gaming facilities in order to prevent light pollution and maintain the quality of dark skies surrounding their respected facilities. Additionally, County staff is available for consultation and would appreciate the opportunity to review any lighting plans available in order to diminish the potential impacts of bright lighting.
- 3-20 The County recommends that the suggestions issued by the U.S. Department of Fish and Wildlife, as previously discussed in the assessment of the proposed Pala Gaming Facility, be adhered to as much as possible.

- 3-21 The County recommends submittal of visual impact surveys specifically addressing dark skies and light pollution impacts. It would also be helpful to review biological resources reports that address potential impacts to wildlife movement, breeding and migration patterns from light pollution.

Health and Human Services

- 3-22 The County of San Diego should encourage, and if necessary, assist the Tribes in developing ambulance services that are readily available for on-reservation visitors, residents and gaming employees through agreements with off-reservation ambulance providers or by providing 9-1-1 services on the reservation.
- 3-23 The County should encourage the Tribes to make adequate health care coverage for residents and employees of the reservation one of the first benefits that tribal nations implement.

Hydrology and Water Quality

- 3-24 The County encourages the Tribes to consult/work with the EPA, the State Water Resources Control Board, the Regional Water Quality Control Board, and the County Department of Public Works Staff to ensure that projects propose and implement appropriate management strategies to preclude impacts to water quality as a result of construction and post-construction activities.

Noise

- 3-25 The County should work with the Tribes to ensure that appropriate acoustical studies are prepared for all proposed facilities in order to adequately address impacts from roadway noise.
- 3-26 The County should encourage the Tribes to implement a data-sharing arrangement between the Tribes and the County to reduce data redundancy for roadways with cumulative or shared impacts and provide a consistent database for determining CNEL and the design of mitigation measures.
- 3-27 The County should encourage the Tribes to contact the County about any technical issues in conducting noise studies.

Public Safety

No Recommendations have been made for this resource area.

Water Resources

- 3-28 The County should work with the Indian Tribes so that data can be gathered on and around the reservations in order to evaluate long-term impacts from the water production. A network of monitoring wells, similar to the groundwater-monitoring network established around the Barona Reservation, should also be established near

the Sycuan and Viejas Reservations. These networks would assist in the determination if adverse impacts were occurring in areas surrounding these reservations.

5.2 Summary of Recommendations Relating to Other Anticipated Impacts and Issues

Economic Impacts

- 4-1 The County should develop an agreement with the Tribes to hire local supplies and service providers. This will keep the secondary jobs within the region and allow these companies to earn taxable income and provide additional local jobs.
- 4-2 The County should enter into a revenue sharing agreement that allows for some of the forthcoming revenue to be directed toward necessary support services and infrastructure.
- 4-3 The County should work with the Tribes in developing a joint marketing plan that is directed toward recruitment of outside visitors to the casinos.
- 4-4 The County should request the casinos market nearby tourist support businesses to direct visitors to taxable sources.
- 4-5 The County should encourage Tribes to diversify their economy through other non-gambling business ventures.

Revenue

- 4-6 The Board should send a letter to Governor Davis asking for the intent and interpretations of the provisions of the Compacts, which staff identifies as not being clear.
- 4-7 The Board should instruct its Sacramento Representative to work with the Administration and other interested parties to secure maximum funding available for the County of San Diego through the budget or grant process.
- 4-8 To expedite the grant process, the Board should develop agreements with the local Tribes, which specify for which purposes the Tribes would support grants from the Fund to the County.

Taxation

- 4-9 Encourage the Tribes to contribute a fair portion of the improvements on the reservations to pay for property-related services.

“In Trust” Lands And Off-Reservation Gambling:

- 4-10 The County should continue to express to the Bureau of Indian Affairs that land acquisitions taken into trust should only be used for the intended purpose stated in the Land Trust Action application submitted to the Bureau.
- 4-11 The County must continue to be consulted by the Secretary of the Interior when Indian Tribes propose to establish gambling on lands transferred into trust after 1988 to ensure that such a proposal would not be detrimental to the surrounding community.
- 4-12 The County should work to increase communication and cooperation between the County of San Diego and the Bureau of Indian Affairs for “in trust” applications and Environmental Assessments. This should include the development of a format and standards for the information to be presented that provides local government with the information needed to make an informed analysis of the actual impacts of the proposals.
- 4-13 The County should cooperatively work with the Tribes to develop a procedure to ensure that jurisdictional problems and potential conflicts of land use that may arise are considered in the decision making and that good faith effort is made to mitigate the environmental and community impacts of gaming facilities.
- 4-14 The County should begin preparation of recommendations for changes needed by local government for submittal to the Governor and legislature in anticipation of the review of the Compacts that is to occur in March of 2003.

Chapter 6

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Appendices

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Appendix A

Preliminary Traffic Assessment Of Impacts of Indian Gaming Projects in the San Diego Region

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PRELIMINARY TRAFFIC ASSESSMENT OF INDIAN GAMING PROJECTS IN THE SAN DIEGO REGION

October 17, 2000

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EXECUTIVE SUMMARY

A preliminary traffic assessment of the off-reservation impacts to County-maintained arterials and State highways near the proposed Indian Gaming projects in the San Diego Region has been prepared. The report assesses the potential traffic impacts associated with proposals to expand and/or develop Indian Gaming facilities on five reservations within San Diego County. These are Barona, Jamul, Pala, Rincon, and San Pasqual. The Pauma, La Jolla, Ewiiapaayp (Cuyapaip), Campo and Manzanita Tribes have each signed a State Compact for class III Indian Gaming have not yet submitted specific project descriptions. Roads, which could potentially be impacts from future Indian Gaming development on these reservations, are discussed by comparison with the analysis conducted for the other Indian Gaming projects.

EXISTING CONDITIONS

County-maintained arterials and State highways near the existing and proposed Indian Gaming projects, which are currently operating below the LOS D standard, are identified below:

- **County-maintained Arterials**
 - Maplevue Street (Ashwood Street to Lake Jennings Park Road) – LOS E
 - San Vicente Road (Main Street to Gunn Stage Road) – LOS E
 - Wildcat Canyon Road (Barona Entrance to Willow Road) – LOS F
 - Willow Glen Drive (Steele Canyon Road to Jamacha Road/SR 54) – LOS E
 - Cole Grade Road (Fruitvale Road to Valley Center Road) – LOS E
 - Valley Center Road (Cole Grade Road south to Lake Wohlford Road) - LOS E/F
 - Willows Road (West Willows Road to Viejas Entrance) – LOS E
 - Dehesa Road (Willow Glen Drive to El Cajon City line) – LOS D/E
- **State Highways**
 - State Route 67 (Willow Road to Maplevue Street) – LOS F
 - State Route 94 (north of Avocado Boulevard to Lyons Valley Road) - LOS E

It should be noted that the County-maintained roads that provide access to the three existing Indian gaming facilities Barona, Sycuan, and Viejas are currently operating below LOS D. These include Wildcat Canyon Road, Dehesa Road and Willows Road. The County of San Diego has negotiated with the respective Indian Tribes to obtain funding toward and/or make improvements to portions of these roads to partially address the LOS deficiencies.

It should also be noted that improvements to Valley Center Road (Cole Grade Road south the Lake Wohlford Road) and Cole Grade Road (Fruitvale Road to Valley Center Road) are currently scheduled in the County of San Diego's Capital Improvement Program. These sections of road are scheduled to be improved from 2 to 3 lanes (continuous left turn lane). Caltrans is also scheduled to provide operational improvements to SR 94. Construction of these improvements, however, will take 6 to 7 years to complete.

POTENTIAL TRAFFIC IMPACTS

DIRECT NEAR TERM TRAFFIC IMPACTS

Potential near term traffic impacts were assessed by estimating the number of trips generated for the individual Indian Gaming facility and then distributing the estimated trips onto the existing road network. Trip generation estimates for the proposed Indian Gaming facilities were based upon driveway counts which were available for existing Barona Indian Gaming facility. Actual traffic generation for each facility may vary. Competition and saturation of the potential gaming market from the proposed gaming facilities may also lower the average trip generation rate.

If the additional traffic generated by a proposed Indian Gaming facility caused the level of service for an existing road or highway to fall below LOS D a significant impact was identified. A significant impact was also identified if the additional traffic generated by a proposed Indian Gaming facility significantly increased the traffic volume on an existing road or highway currently operating below LOS D. Potential near term traffic impacts of the proposed Indian Gaming facilities are as follows:

DIRECT IMPACTS

- **Barona**
 - Maplevue Street (Ashwood Street to Lake Jennings Park Road) – LOS E
 - San Vicente Road (Main Street to Gunn Stage Road) – LOS E
 - Wildcat Canyon Road (Barona Entrance to Willow Road) – LOS F
 - Willow Road (SR 67 to Wildcat Canyon Road) – LOS F
 - State Route 67 (Willow Road to Maplevue Street) – LOS F
- **Jamul**
 - Jamacha Boulevard (Sweetwater Road to Grand Avenue) – LOS E
 - Jamacha Road (Willow Glen Drive to Washington Avenue) – LOS E
 - Steele Canyon Road (Willow Glen Drive to SR 94) – LOS E/F
 - Willow Glen Drive (Steele Canyon Road to Jamacha Road/SR 54) – LOS E
 - State Route 94 (north of Avocado Boulevard to Lyons Valley Road) – LOS E
- **Pala**
 - Cole Grade Road (Cool Valley Road to Valley Center Road) – LOS E
 - State Route 76 (I-15 to Lilac Road) – LOS F
- **Rincon**
 - Valley Center Road (Cole Grade Road south to Lake Wohlford Road) – LOS E/F
- **San Pasqual**
 - Lake Wohlford Road (Woods Valley Road to Valley Center Road) – LOS E
 - Lilac Road (Old Castle Road to Valley Center Road) – LOS E
 - Valley Center Road (Cole Grade Road south to Lake Wohlford Road) – LOS E/F

NEAR TERM CUMULATIVE IMPACTS

Potential near term cumulative traffic impacts were assessed by distributing the estimated trips associated with all of the proposed Indian Gaming facilities onto the existing road network. A cumulative traffic impact was identified if the additional traffic generated by a proposed Indian Gaming facility significantly increased the traffic volume on an existing road or highway currently operating below LOS D as a result of the combined traffic from all of the proposed Indian Gaming projects. Potential near term traffic impacts of the proposed Indian Gaming facilities are as follows:

- **Barona**
 - No additional impacts were identified
- **Jamul**
 - No additional impacts were identified
- **Pala**
 - Lake Wohlford Road (Woods Valley Road to Valley Center Road) – LOS E
 - Lilac Road (Old Castle Road to Valley Center Road) – LOS E
 - Valley Center Road (Cole Grade Road south to Lake Wohlford Road) - LOS E/F
- **Rincon**
 - Lake Wohlford Road (Woods Valley Road to Valley Center Road) – LOS E
 - Lilac Road (Old Castle Road to Valley Center Road) – LOS E
 - Cole Grade Road (Cool Valley Road to Valley Center Road) – LOS E
 - Valley Center Road (Cole Grade Road north east to SR 76 Pala Road) – LOS E
 - State Route 76 (I-15 to Lilac Road)
- **San Pasqual**
 - Lake Wohlford Road (Woods Valley Road to Valley Center Road) – LOS E
 - Lilac Road (Old Castle Road to Valley Center Road) – LOS E
 - Valley Center Road (Cole Grade Road south to Lake Wohlford Road) - LOS E/F
 - Cole Grade Road (Cool Valley Road to Valley Center Road) – LOS E
 - State Route 76 (I-15 to Lilac Road)

By comparison with the above projects, the future Indian Gaming projects on the Pauma and La Jolla Reservations will further impact SR 76. Future Indian gaming projects on the Campo, Ewiiapaayp, and Manzanita reservations would likely impact I-8 and to a lesser degree SR 94. County-maintained roads used to access these projects, would also be impacted.

BUILD-OUT

Potential near term traffic impacts were assessed by estimating the number of trips generated for the individual Indian Gaming facility and then distributing the estimated trips onto the ultimate road network (County's General Plan Circulation Element). A SANDAG Series 9 20-year forecast was used to provide the base volumes for the ultimate road network. Development of the proposed Indian Gaming projects will also impact the Circulation Element of the County of San

Diego's General Plan. At build-out, with the proposed Indian Gaming projects several Circulation Element Roads and State highways near the proposed Indian Gaming Projects are projected to operate below LOS D. These are as follows:

- **County-maintained Arterials**
 - Pala Temecula Road (SR 76 to Riverside County line) – LOS F
 - Cole Grade Road (Cool Valley to Valley Center Road) – LOSE/F
 - Valley Center Road (Lilac to Lake Wohlford Road) – LOS E/F
 - Lake Wohlford Road (Valley Center Road to Valley Center Road) – LOS F
 - Woods Valley Road (Valley Center Road to Lake Wohlford Road) – LOS D/F
 - Ashwood Street (Willow Road to Mapleview Street) – LOS F
 - Wildcat Canyon Road (San Vicente Road to Willow Road) – LOS E/F
 - Willow Road (SR 67 to Wildcat Canyon Road) – LOS F
- **State Highways**
 - SR 94 (Jamacha Road to Otay Lakes Road) – LOS F
 - SR 76 (I-15 to Cole Grade Road) – LOS F

IMPROVEMENTS

TIMING

Prior to construction of a road improvement project many studies must be completed. Figure ES-1 identifies the key steps for implementing a road improvement project. These include the following; 1) identification of purpose and need, 2) Project Studies Report (for State highways) or an opportunities and constraints report (for County arterials), 3) Environmental Impact Statements/Environmental Impact Reports, 4) Preliminary Engineering, and Detailed Engineering. In addition, prior to construction required permits must be obtained, mitigation measures implemented and right-of-way acquired. It would take approximately 7 years to construct major improvements to a State highway and approximately 6 years to construct major improvements to a County arterial.

Over the years, most improvement projects on the rural highways have addressed safety and operational concerns such as intersection upgrades, curve corrections, passing lanes, adding shoulders, etc. In recent years, however, the County and Caltrans have experienced increasing difficulty in development of these operational and safety projects. This is due to the increasing environmental sensitivity in the rural corridors that are rich in biological, historical, and visual resources. Organized resistance to improvement projects from factions within the back county communities has also surfaced. For example, residents along Wildcat Canyon Road have voiced opposition to any project that would widen this road to four lanes. In addition, a "passing lanes" project on SR-94 is currently delayed as the Negative Declaration was legally challenged. Caltrans considered the elements of the suit and agreed that an EIS/EIR is the appropriate document. It is anticipated that 6 to 7 years will be required to process that document.

ESTIMATES

The total miles of impacted County-maintained arterials is 56.47 miles. The total miles impacted State highways is 17.29 miles. Based upon an average length of impacted segment and an average improvement cost per lane mile factor, estimates of improvement costs were made. These estimates are very preliminary and are based upon average costs and general assumptions. Actual costs for each improvement project will vary based upon environmental constraints, mitigation measures, engineering features, right-of way acquisitions, and other factors. The estimated total cost to construct improvements to County-maintained arterial is \$ 167,958,000. The estimated total cost to construct improvements to the State highways is \$ 302,100,000. A breakdown of the costs attributable to each reservation is provided in the following table:

INDIAN GAMING ROAD IMPROVEMENT COST SUMMARY TABLE

CASINO	COUNTY ARTERIAL COSTS	STATE HIGHWAY COSTS	COMBINED COSTS
BARONA	\$ 69,444,000	\$ 13,400,000	\$ 82,844,000
JAMUL	\$ 25,776,000	\$ 200,900,000	\$ 226,676,000
PALA	\$ 76,726,000 \$ 5,644,000	\$ 5,644,000 \$ 76,726,000	\$ 82,370,000
RINCON	\$ 2,946,000 \$ 24,185,000	\$ 24,185,000 \$ 2,946,000	\$ 27,131,000
SAN PASQUAL	\$ 8,129,000 \$ 35,259,000	\$ 35,259,000 \$ 8,129,000	\$ 43,387,000
SYCUAN	\$ 3,564,000	- 0 -	\$ 3,564,000
VIEJAS	\$ 4,086,000	- 0 -	\$ 4,086,000
ALL ABOVE PROJECTS	\$167,958,000	\$302,100,000	\$470,058,000

FUNDING

In the case of the County, the \$167,958,000 in estimated needed improvements is beyond the reach of what can be funded with the \$ 7 million average annual San Diego County gas tax funds available for capital improvements. TRANSNET funds from 1987 San Diego County approved Proposition A (the San Diego Transportation Improvement Program) have been fully allocated and are not available. Although an extension of the TRANSNET sales tax has been suggested by some, it can not be assumed that such an extension would provide sufficient funds. Extension of the TRANSNET sales tax will also require approval by a 2/3 vote which can not be assured.

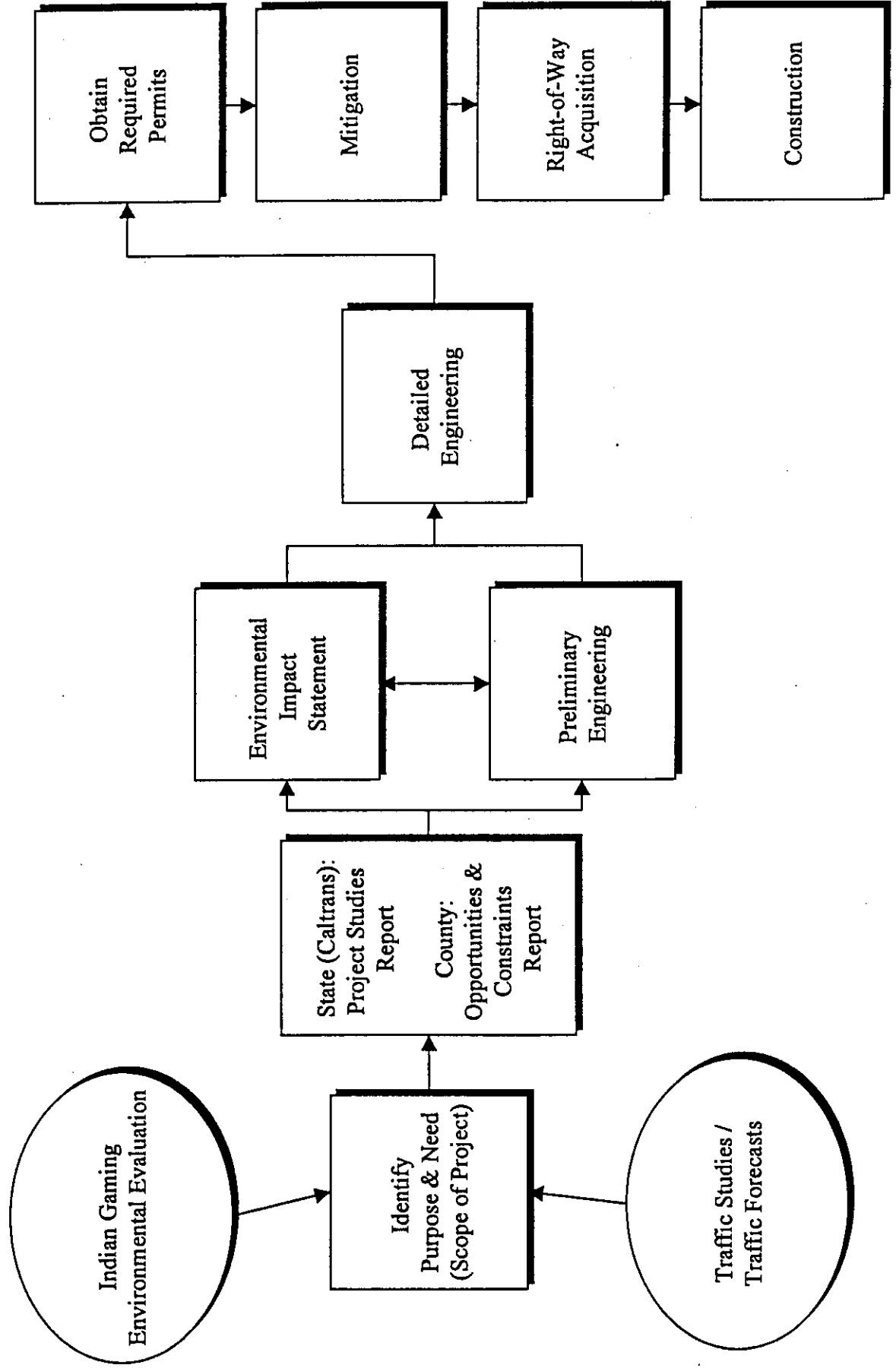
The normal funding methods for road improvements can not meet the anticipated need for road improvements. Commitments should be obtained from the Indian Tribes for funding contributions towards the needed road improvements. These could serve as a local match to help leverage federal and/or state funding for the needed road improvements. Attempts should also be made to obtain special one-time state and/or federal funding.

The Tribes are willing to pay their "Fair Share" to mitigate impacts. Calculation of Fairshare contributions toward road and highway improvements should be based upon a detailed cost estimate that has been assessed after the road improvement project have been identified, environmental constraints have been assessed and preliminary cost estimates prepared. The actual cost for completion of the road improvement project will vary considerably as the project is developed. Other factors should also be considered in the calculation of fairshare contributions. These include 1) the percentage of the road improvement cost that will not receive State, federal and/or County funding, 2) other development projects in the area which will generate traffic on the road or highway being improved, and 3) the time frame when the construction activity will take place.

Traditionally, funding for capacity increasing projects for the San Diego Region are directed by the San Diego Association of Governments (SANDAG) and are part of the State Transportation Improvement Plan (STIP). Priorities and commitments have been established for the currently allocated State and federal funds. Improvements to rural highways, due to this expansion of Indian Gaming, would compete region-wide for additional funding as it becomes available. Potential funding sources include:

- The revenues generated from the Compacts to fund transportation infrastructure. The Tribes have established a Reservation Transportation Authority with representation from each of the Tribes. One of the goals for this group is to lobby for those funds returned and invested in the region.
- State funding from the Interregional Improvement Plan (IIP) approved by the California Transportation Commission (CTC) may be appropriate to deal with the impacts.

FIGURE ES-1
State Highway / County Arterial - Roadway Improvement Process



RECOMMENDATIONS

A detailed cumulative traffic impact study should be prepared to assess the near term cumulative traffic impacts of all of the proposed Indian Gaming projects. The Indian Tribes should be encouraged to collaborate on the completions of these studies. The exchange of information would help each tribe complete their study and the pooling of resources would help pay for the study. The study should also be updated to account for additional and/or expanded Indian Gaming projects which may be proposed in the future.

Additional studies should be conducted to better discern the trip generation and assessment assumptions utilized within this report. Trip generation rates of Indian Gaming facilities in the San Diego region should be documented and an average rate for analysis developed. Trip generation rates may vary from facility to facility and may also vary due to the dramatic increase in the total number of gaming facilities that will be provided in San Diego County. In addition, an evaluation should also be made to discern whether a peak hour traffic assessment would be more representative of the operations of the two-lane rural arterials servicing the proposed Indian Gaming projects.

Several rural County-maintained arterials and State highways were constructed many years ago prior to the adoption of the current highway standards. Improvements to several County-maintained arterials and State highways will be needed in the near term as the Indian Gaming projects develop. Operational and safety studies should be conducted to determine which operational and safety improvements should be implemented in the near term. Initial studies to assess the environmental and engineering constraints for road capacity improvements to impacted County arterials and State highways should also be conducted. The Indian Tribes should pay to implement these studies. These studies should include an operational study/road survey for Lake Wohlford Road and a project studies report for SR 76 east of I-15. The process to implement these road and highway improvements is provided in Figure ES-1.

The County should negotiate with the Indian Tribes to obtain fairshare contributions toward road improvements to roads and highways which are impacted by the proposed Indian Gaming projects. Fairshare calculations for construction costs, however, should occur after the completion of initial studies to define the improvement projects, assess environmental constraints and prepare preliminary engineering. Implementation of the road improvement projects will take several years to complete.

The total cost of needed improvements is exorbitant. The County and Indian Tribes should actively seek State and federal funds to construct needed improvements. The County and the Tribes should collaborate on the submission of viable road improvement projects to State and Federal agencies to construct. Applications should also be submitted for federal and/or state funds to construct the needed improvements.

During the General Plan 2020 project, that is being processed by the County of San Diego, the arterial and highway corridors near the Indian Reservations should be examined to ensure the appropriate Circulation Element classification and land use pattern to ensure that the LOS D standard can be satisfied.

INTRODUCTION

Eighteen sovereign Indian Nations are located in the San Diego Region. The Indian nations/reservations are located in the rural backcountry of the unincorporated area of San Diego. Access to the reservations is by County-maintained arterials and/or State highways.

Passage of Proposition 1A in the spring 2000 election legalized the creation of State Compacts between the Indian Tribes and the State of California for Indian Gaming projects. Individual tribes, in the San Diego Region, have entered Compacts with the State of California for the creation and/or expansion of Indian Gaming projects on their reservations. These developments are approved through the Bureau of Indian Affairs.

The proposed Indian Gaming projects are not subject to the National Environmental Policy Act (NEPA) or the California Environmental Quality Act (CEQA). They, however, are required, by the State Compacts, to prepare an environmental report that "makes a good faith effort to follow the policies and purposes of the NEPA and CEQA". Further, they are required to make "good faith efforts" to mitigate any and all "significant adverse off-reservation environmental impacts."

This report provides a preliminary traffic assessment of the off-reservation impacts to County-maintained arterials and State highways near the proposed Indian Gaming projects in the San Diego Region. Improvements needed to mitigate the traffic impacts are identified. Issues that would be associated with development and implementation of the improvement projects are also discussed.

The Tribes have expressed a willingness to pay their "Fair Share" to mitigate traffic impacts. Cost estimates to construct the needed off-reservation traffic improvements are provided. Issues associated with the determination of fairshare contributions are provided and recommendations made regarding the allocation of fairshare costs.

INDIAN GAMING PROJECTS

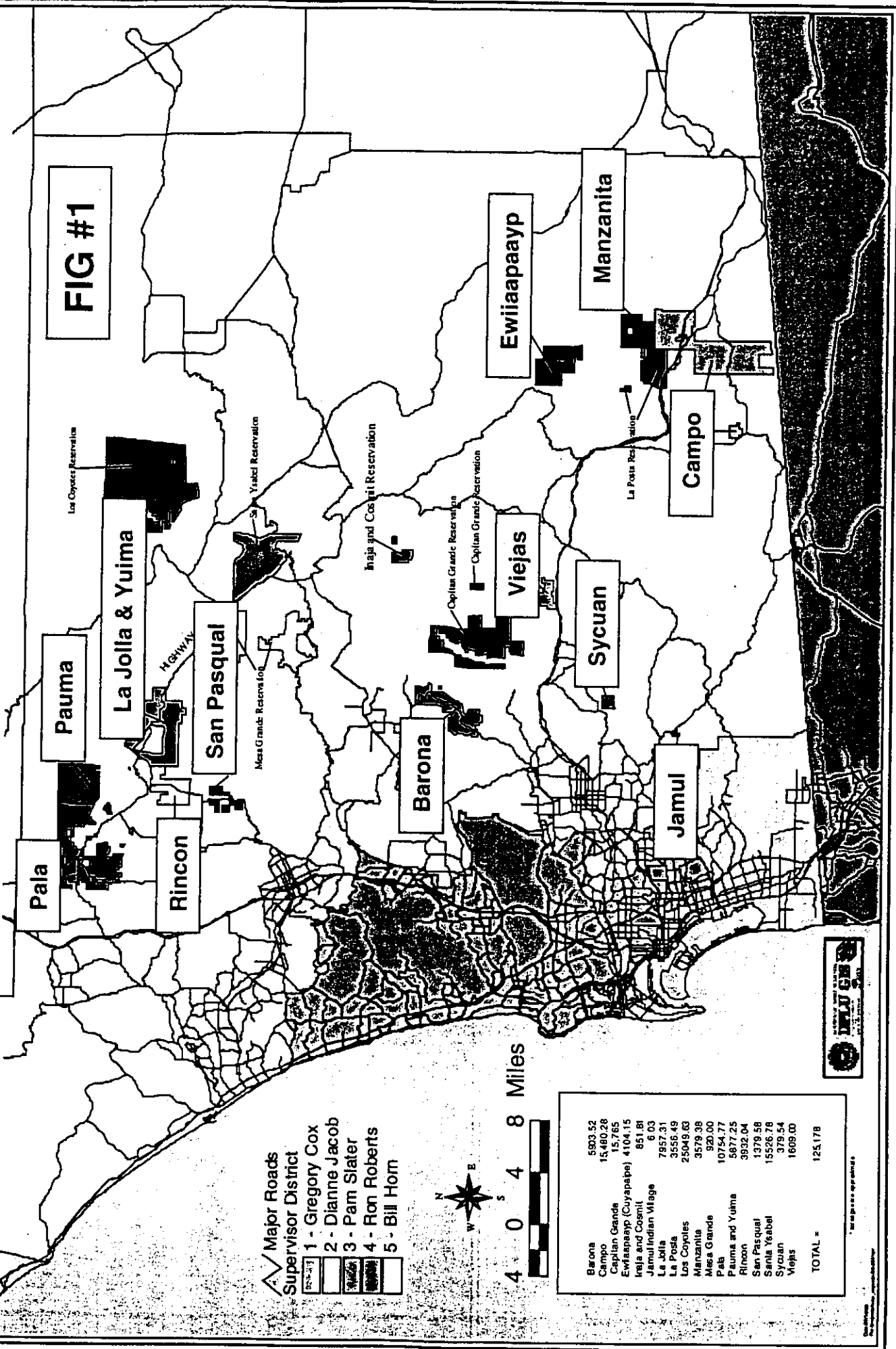
A map showing the locations of the Indian Reservations in San Diego County is provided in Figure 1. Three Indian Gaming projects are currently in operation within the San Diego County. These are Barona, Sycuan and Viejas. Current traffic conditions on County and State highways near these projects are provided herein.

Proposals to develop Indian Gaming projects on four additional reservations have been received by County staff and have been assessed within this report. These are Jamul, Pala, Rincon and San Pasqual. The Rincon and San Pasqual Tribes are preparing an interim facility, which will be in place before development of the permanent facilities. A proposal to significantly expand the operations conducted on the Barona reservation has also been received and is assessed within this report.

Indian Reservations In San Diego County

RESERVATIONS WITH SIGNED GAMING COMPACTS

FIG #1



Major Roads

Supervisor District

- 1 - Gregory Cox
- 2 - Dianne Jacob
- 3 - Pam Slater
- 4 - Ron Roberts
- 5 - Bill Horn



4 0 4 8 Miles

Barona	5903.52
Campo	15,480.28
Capitan Grande	15,765
Ewilaapaayp (Cuyamapo)	4104.15
Inaja and Cocopi	861.89
Jamul Indian Village	6.03
La Jolla	7957.31
La Posta	3556.49
Los Coyotes	25049.63
Manzanita	3579.38
Mesa Grande	920.00
Pala	10754.77
Pauma and Yuima	5877.25
Rincon	3932.04
San Pasqual	1379.58
Santa Ysabel	15526.78
Sycuan	379.54
Viejas	1609.00
TOTAL =	125,178



The Pauma, La Jolla, Ewiiapaayp (Cuyapaip), Campo and Manzanita Tribes have each signed a State Compact for class III Indian Gaming. County staff, however, have not yet received specific proposals for these projects. Impacts associated from these future projects have not been assessed in detail in this report. These tribes may develop Indian Gaming projects in the future. Roads, which could potentially be impacted from future Indian Gaming development on these reservations, will be identified.

TRIP GENERATION

SANDAG trip generation rates do not currently include a trip generation rate for an Indian Gaming facility/casino. The trip generation estimates used in this report for the Indian Gaming facilities/casinos were derived from driveway traffic count data available for the Barona Casino and comparisons with ITE trip generation data. Driveway traffic counts taken for the existing Barona Casino are provided in Exhibit A. It is assumed the traffic patterns established at this existing gaming facility would be representative of the traffic pattern that will result at the other proposed Indian Gaming facilities. Additional studies should be conducted, however, to better document the trip generation rates of Indian Gaming facilities in the San Diego region. SANDAG trip generation rates were used for the other activities, such as a golf course and a hotel, which are also being proposed on some reservations. Trip generation estimates were prepared for the proposed Indian Gaming projects for which County staff has received a detailed project description. The trip generation estimates are summarized in Table 1.

TABLE 1
Trip Generation Estimates

BARONA RESERVATION – GAMING FACILITY EXPANSION			
LAND USE TYPE	LAND USE UNITS	TRIP RATE FACTOR	TOTAL DAILY TRIPS
GAMING FACILITY EXPANSION	*168,000 square feet	130 trips/1000 square feet	21,840
HOTEL	125 rooms	8 trips/room	1,000
GOLF COURSE	18 hole course	700 trips/course	700
TOTAL DAILY TRIPS GENERATED			23,540

* The Barona Indian Reservation is proposing a 293,000 square foot gaming facility. The existing gaming facility at the Barona Indian Reservation is approximately 125,000 square feet. The proposed expansion would represent a 168,000 square foot increase in the size of the gaming facility.

TABLE 1 (continued)
Trip Generation Estimates

JAMUL RESERVATION – GAMING FACILITY EXPANSION			
LAND USE TYPE	LAND USE UNITS	TRIP RATE FACTOR	TOTAL DAILY TRIPS
GAMING FACILITY EXPANSION	245,000 square feet	130 trips/1000 square feet	31,850
HOTEL	250 rooms	8 trips/room	2,000
RELOCATED HOMES	15 HOMES	10 trips/home	150
TOTAL DAILY TRIPS GENERATED			34,000

PALA RESERVATION – GAMING FACILITY			
LAND USE TYPE	LAND USE UNITS	TRIP RATE FACTOR	TOTAL DAILY TRIPS
GAMING FACILITY	187,000 square feet	130 trips/1000 square feet	24,310
TOTAL DAILY TRIPS GENERATED			24,310

RINCON RESERVATION – TEMPORARY GAMING FACILITY			
LAND USE TYPE	LAND USE UNITS	TRIP RATE FACTOR	TOTAL DAILY TRIPS
GAMING FACILITY	17,585 square feet	130 trips/1000 square feet	2,286
TOTAL DAILY TRIPS GENERATED			2,286

TABLE 1 (continued)
Trip Generation Estimates

RINCON RESERVATION – PERMANENT GAMING FACILITY			
LAND USE TYPE	LAND USE UNITS	TRIP RATE FACTOR	TOTAL DAILY TRIPS
GAMING FACILITY	45,000 square feet	130 trips/1000 square feet	5,850
HOTEL	200 rooms	8 trips/room	1,600
TOTAL DAILY TRIPS GENERATED			7,450

SAN PASQUAL RESERVATION – TEMPORARY GAMING FACILITY			
LAND USE TYPE	LAND USE UNITS	TRIP RATE FACTOR	TOTAL DAILY TRIPS
GAMING FACILITY	40,600 square feet	130 trips/1000 square feet	5,278
TOTAL DAILY TRIPS GENERATED			5,278

SAN PASQUAL RESERVATION – PERMANENT GAMING FACILITY			
LAND USE TYPE	LAND USE UNITS	TRIP RATE FACTOR	TOTAL DAILY TRIPS
GAMING FACILITY	195,000 square feet	130 trips/1000 square feet	25,350
TOTAL DAILY TRIPS GENERATED			25,350

TRIP DISTRIBUTION

The estimated number of trips generated by each proposed Indian Gaming project were manually distributed onto the existing and future road networks. The trip distribution assumptions for Indian Gaming projects were based on existing/observed traffic patterns, traffic count data, and information provided in previously prepared traffic studies for the proposed gaming facilities. The trip distribution assumptions were adjusted for the future-year scenarios in order to account for build-out of the County's Circulation Element Plan roadway system. Figures identifying the assumption trips distribution for each proposed Indian Gaming Projects are provided in Exhibit B.

ANALYSIS CRITERIA

Levels of service for County-maintained arterials were assessed using the County of San Diego's level of service thresholds (Exhibit C). These thresholds are based upon a 24-hour traffic volume. The Barona Casino driveway counts, as provided in Exhibit A, indicate that although the highest 24-hr traffic volumes occurred on Friday, they were only approximately 15% higher than the traffic volumes that were occurring on the other weekdays (Monday through Thursday). The 24-hour traffic volume threshold was, therefore, deemed appropriate for the analysis of County-maintained arterials. Levels of service for State highways were assessed by Caltrans using a methodology based on lane capacity, peak-hour traffic, and direction flows of traffic. Additional studies should be conducted to discern whether a peak hour traffic assessment would be more representative of the operations of the two-lane rural arterials servicing the proposed Indian Gaming projects.

Per the County's Public Facilities Element, a level of service D standard has been established for the assessment of impacts to off-site Circulation Element roads. Impacts from each of the proposed Indian Gaming projects were then assessed according to the following criteria:

1. If the additional traffic generated by a proposed Indian Gaming Project significantly increased the amount of traffic roads currently operating below LOS D, it would result in a significant off-reservation traffic impact;
2. If the additional traffic generated by the proposed Indian Gaming projects caused the level of service to fall below LOS D threshold, it would result in a significant off-reservation traffic impact.

An impact would be considered a direct impact if the traffic generated by the individual Indian Gaming project only would trigger one of the above criteria. An impact was considered cumulative if the traffic generated by the individual Indian Gaming project in conjunction with the traffic generated by the other proposed Indian Gaming project in the area would trigger the above criteria.

EXISTING CONDITIONS

Primary access to the Indian Gaming projects is from County-maintained arterials and/or State highways. Traffic volumes for local arterials and State highways near the Indian reservations are provided in Figures 2A, 2B and 2C. These volumes were obtained from the 2000 Traffic flow map for the San Diego Metropolitan Area, prepared by the San Diego Association of Governments, and the San Diego County Master Traffic Census, prepared by the County of San Diego Department of Public Works.

A summary of the existing traffic volumes and levels of service for arterials and State Highways near existing Indian Gaming projects and proposed gaming projects is provided in Table 2. County-maintained arterials and State highways near the existing and proposed Indian Gaming projects, which are currently operating below the LOS D standard, are identified below:

- **County-maintained Arterials**
 - Mapleview Street (Ashwood Street to Lake Jennings Park Road) – LOS E
 - San Vicente Road (Main Street to Gunn Stage Road) – LOS E
 - Wildcat Canyon Road (Barona Entrance to Willow Road) – LOS F
 - Willow Glen Drive (Steele Canyon Road to Jamacha Road/SR 54) – LOS E
 - Cole Grade Road (Fruitvale Road to Valley Center Road) – LOS E
 - Valley Center Road (Cole Grade Road south to Lake Wohlford Road) – LOS E/F
 - Willows Road (West Willows Road to Viejas Entrance) – LOS E
 - Dehesa Road (Willow Glen Drive to El Cajon City line) – LOS D/E
- **State Highways**
 - State Route 67 (Willow Road to Mapleview Street) – LOS F
 - State Route 94 (north of Avocado Boulevard to Lyons Valley Road) – LOS E

It should be noted that the County-maintained roads that provide access to the three existing Indian gaming facilities Barona, Sycuan, and Viejas are currently operating below LOS D. These include Wildcat Canyon Road, Dehesa Road and Willows Road. The County has negotiated with the respective Indian Tribes to obtain funding toward and/or make improvements to portions of these roads.

Improvements to Valley Center Road (Cole Grade Road south the Lake Wohlford Road) and Cole Grade Road (Fruitvale Road to Valley Center Road) are currently scheduled in the County of San Diego's Capital Improvement Program. These sections of road are scheduled to be improved from 2 to 3 lanes (continuous left turn lane). Caltrans is also scheduled to provide operational improvements to SR 94. Construction of these improvements, however, will take 6 to 7 years to complete. These improvements are needed to accommodate the existing traffic volumes and are not likely to be sufficient to accommodate the additional traffic generated by the proposed Indian Gaming projects.

TABLE 2
Existing, Existing Plus Project (Temporary and Permanent), and Near-Term Cumulative Scenarios
LOS E & F Roads

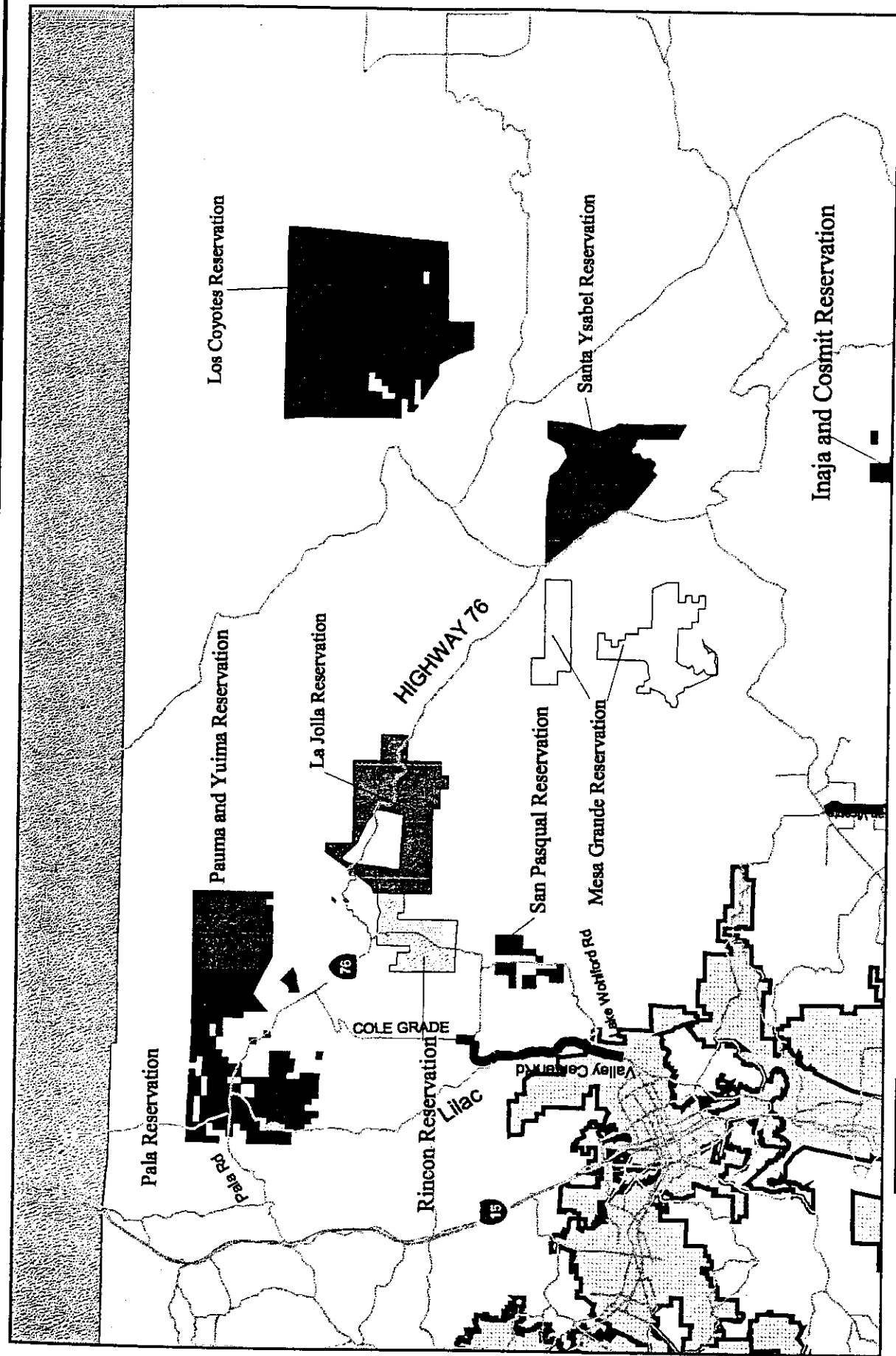
Road	Segment	Existing ADT*	Existing LOS	Existing with Temp. Project ADT*	Existing with Temp. Project LOS	Existing with Perm. Project ADT*	Existing with Perm. Project LOS	Near-term Cumulative ADT	Existing with Perm. Project LOS	Near-term Cumulative LOS (E&F)
BARONA										
4 Mapleview St.	Ashwood St. to Lake Jennings Park Rd.	13	E			17.7	E	17.7	E	E
5 San Vicente Rd.	Main St. to Hanson Lane	11	E			13.4	E	13.4	E	E
6 San Vicente Rd.	Hanson Lane to Dye Rd.	14	E			16.4	F	16.4	F	F
7 San Vicente Rd.	Dye Rd. to Wildcat Canyon Rd.	14	E			19.9	F	19.9	F	F
8 San Vicente Rd.	Wildcat Canyon Rd. to Gunn Stage Rd.	12	E			13.2	E	13.2	E	E
9 Wildcat Canyon Rd.	San Vicente Rd. to Painted Rock Rd.	9	D			16.1	E	16.1	E	E
10 Wildcat Canyon Rd.	Painted Rock Rd. to Barona Entrance	8	D			16.1	E	16.1	E	E
11 Wildcat Canyon Rd.	Barona Entrance to Willow Rd.	17	F			33.5	F	33.5	F	F
12 Willow Rd.	SR67 to Wildcat Canyon Rd.	8	D			19.8	F	19.8	F	F
13 SR67	Willow Rd. to Mapleview St.	32	F			43.8	F	43.8	F	F
JAMUL										
1 Jamacha Blvd.	Sweetwater Rd. to Grand Ave.	26	C			32.8	E	32.8	E	E
2 Jamacha Blvd.	Grand Ave. to Sweetwater Springs Blvd.	25	C			31.8	E	31.8	E	E
4 Jamacha Rd.	Willow Glen Dr. to Hillside Rd.	27	C			32.1	E	32.1	E	E
5 Jamacha Rd.	Hillside Rd. to Chase Ave.	27	C			32.1	E	32.1	E	E
6 Jamacha Rd.	Chase Ave. to Washington Ave.	28	C			31.1	E	31.1	E	E
13 SR94	SR125 to Avocado Blvd.	51-77	C-E			66.3-92.3	D-F	66.3-92.3	D-F	D-F
14 SR94 (Campo Rd.)	Avocado Blvd. to Jamacha Rd.	40-49	E-F			55.3-64.3	F	55.3-64.3	F	F
15 SR94 (Campo Rd.)	Jamacha Rd. to Steele Canyon Rd.	16	E			38.1	F	38.1	F	F
16 SR94 (Campo Rd.)	Steele Canyon Rd. to Lyons Valley Rd.	17	E			45.9	F	45.9	F	F
17 SR94 (Campo Rd.)	Lyons Valley Rd. to Proctor Valley Rd.	9	C			39.6	F	39.6	F	F
19 Steele Canyon Rd.	Willow Glen Dr. to SR94 (Campo Rd.)	4-10	B-D			10.8-16.8	E-F	10.8-16.8	E-F	E-F
21 Willow Glen Dr.	Steele Canyon Rd. to SR54 (Jamacha Rd.)	15	E			20.1	F	20.1	F	F
PALA										
2 Cole Grade Rd.	Cool Valley Rd. to Fruitvale Rd.	10	D			11.2	E	11.9	E	E
3 Cole Grade Rd.	Fruitvale Rd. to Valley Center Rd.	12	E			13.2	E	13.9	E	E
4 Lake Wohlford Rd.	Valley Center Rd. to Woods Valley Rd.	4	B			-	-	11.7	E	E
5 Lake Wohlford Rd.	Woods Valley Rd. to Guelito Rd.	2	B			-	-	19.9	F	F
6 Lake Wohlford Rd.	Guelito Rd. to Valley Center Rd.	2	B			-	-	19.9	F	F
10 Lilac Rd.	Old Castle Rd. to Anthony Rd.	8	D			8.7	D	13.1	E	E
11 Lilac Rd.	Anthony Rd. to Valley Center Rd.	8	D			8.7	D	13.1	E	E
14 SR76 (Pala Rd.)	I-15 to Rice Canyon Rd.	5	B			23.2	F	25.9	F	F
15 SR76 (Pala Rd.)	Rice Canyon Rd. to Pala Temecula Rd.	5	B			24.4	F	27.1	F	F
16 SR76 (Pala Rd.)	Pala Temecula Rd. to Lilac Rd.	5	B			24.4	F	27.4	F	F
20 Valley Center Rd.	SR76 (Pala Rd.) to Lake Wohlford Rd.	3	B			4.2	C	12.7	E	E
RINCON										
2 Cole Grade Rd.	Cool Valley Rd. to Fruitvale Rd.	10	D			10.2	D	11.9	E	E

TABLE 2

Existing, Existing Plus Project (Temporary and Permanent), and Near-Term Cumulative Scenarios
LOS E & F Roads

Road	Segment	Existing ADT*	Existing LOS	Existing with Temp. Project ADT*	Existing with Temp. Project LOS	Existing with Perm. Project ADT*	Existing with Perm. Project LOS	Near-term Cumulative ADT	Near-term Cumulative LOS (E&F)
3	Cole Grade Rd.	12	E	12.1	E	12.2	E	13.9	E
4	Lake Wohlford Rd.	4	B	4.5	C	5.5	C	11.7	E
5	Lake Wohlford Rd.	2	B	2.5	B	3.5	B	19.9	F
6	Lake Wohlford Rd.	2	B	2.5	B	3.5	B	19.9	F
10	Lilac Rd.	8	D	8.3	D	8.9	D	13.1	E
11	Lilac Rd.	8	D	8.3	D	8.9	D	13.1	E
16	SR76 (Pala Rd.)	5	B	5.3	B	5.7	C	25.9	F
17	SR76 (Pala Rd.)	5	B	5.3	B	5.7	C	27.1	F
18	SR76 (Pala Rd.)	5	B	5.3	B	6.0	C	27.4	F
21	Valley Center Rd.	3	B	5.1	C	9.1	D	12.7	E
22	Valley Center Rd.	4	B	5.4	C	8.6	D	12.4	E
23	Valley Center Rd.	16	E	17.3	F	20.4	F	23.7	F
24	Valley Center Rd.	17	F	18	F	20.4	F	23.0	F
25	Valley Center Rd.	18	F	19	F	21.4	F	22.9	F
26	Valley Center Rd.	20	F	21.5	F	24.8	F	41.3	F
SAN PASQUAL									
2	Cole Grade Rd.	10	D	10.1	D	10.5	D	11.9	E
3	Cole Grade Rd.	12	E	12.1	E	12.5	E	13.9	E
4	Lake Wohlford Rd.	4	B	5.3	C	10.3	D	11.7	E
5	Lake Wohlford Rd.	2	B	5.4	C	18.5	F	18.9	F
6	Lake Wohlford Rd.	2	B	5.4	C	18.5	F	19.9	F
10	Lilac Rd.	8	D	8.7	D	11.3	E	13.1	E
11	Lilac Rd.	8	D	8.7	D	11.3	E	13.1	E
16	SR76 (Pala Rd.)	5	B	5.4	B	7	B	25.9	F
17	SR76 (Pala Rd.)	5	B	5.4	B	7	B	27.1	F
18	SR76 (Pala Rd.)	5	B	5.4	B	7	B	27.4	F
21	Valley Center Rd.	3	B	3.5	B	5.5	C	12.7	E
22	Valley Center Rd.	4	B	4.8	C	7.8	D	12.4	E
23	Valley Center Rd.	16	E	16.7	F	19.3	F	23.7	F
24	Valley Center Rd.	17	F	17.5	F	19.5	F	23.0	F
25	Valley Center Rd.	18	F	17.5	F	19.5	F	22.9	F
26	Valley Center Rd.	20	F	23.4	F	365	F	41.3	F
SYCUAN									
3	Dehesa Rd.	10-12	DE					10-12	DE
VIEJAS									
1	Willows Rd.	13.4	E					13.4	E

Note: ADT = Average Daily Traffic / LOS = Level of Service / * = X 1,000 / 1 = Existing ADT (Near-Term Unavailable)

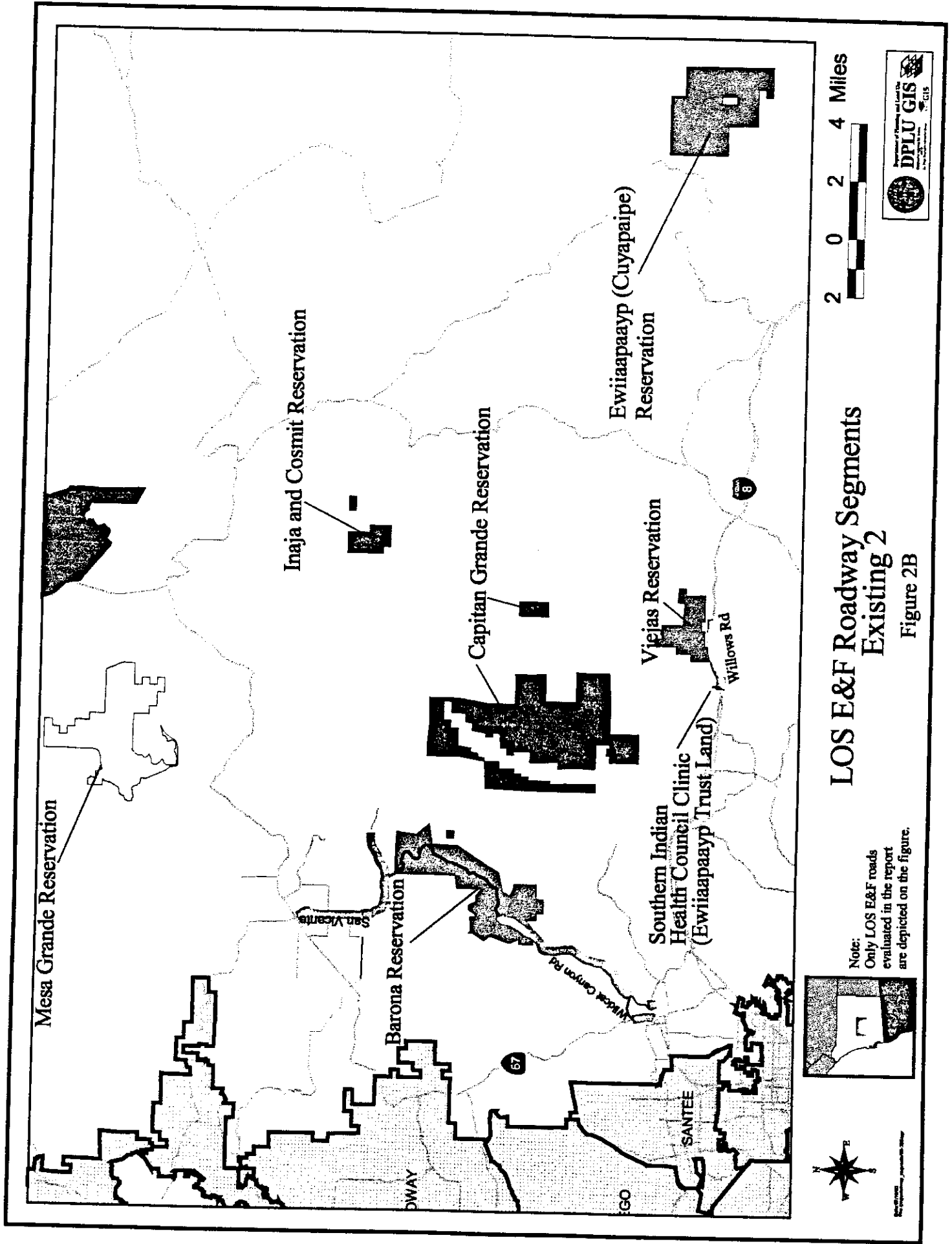


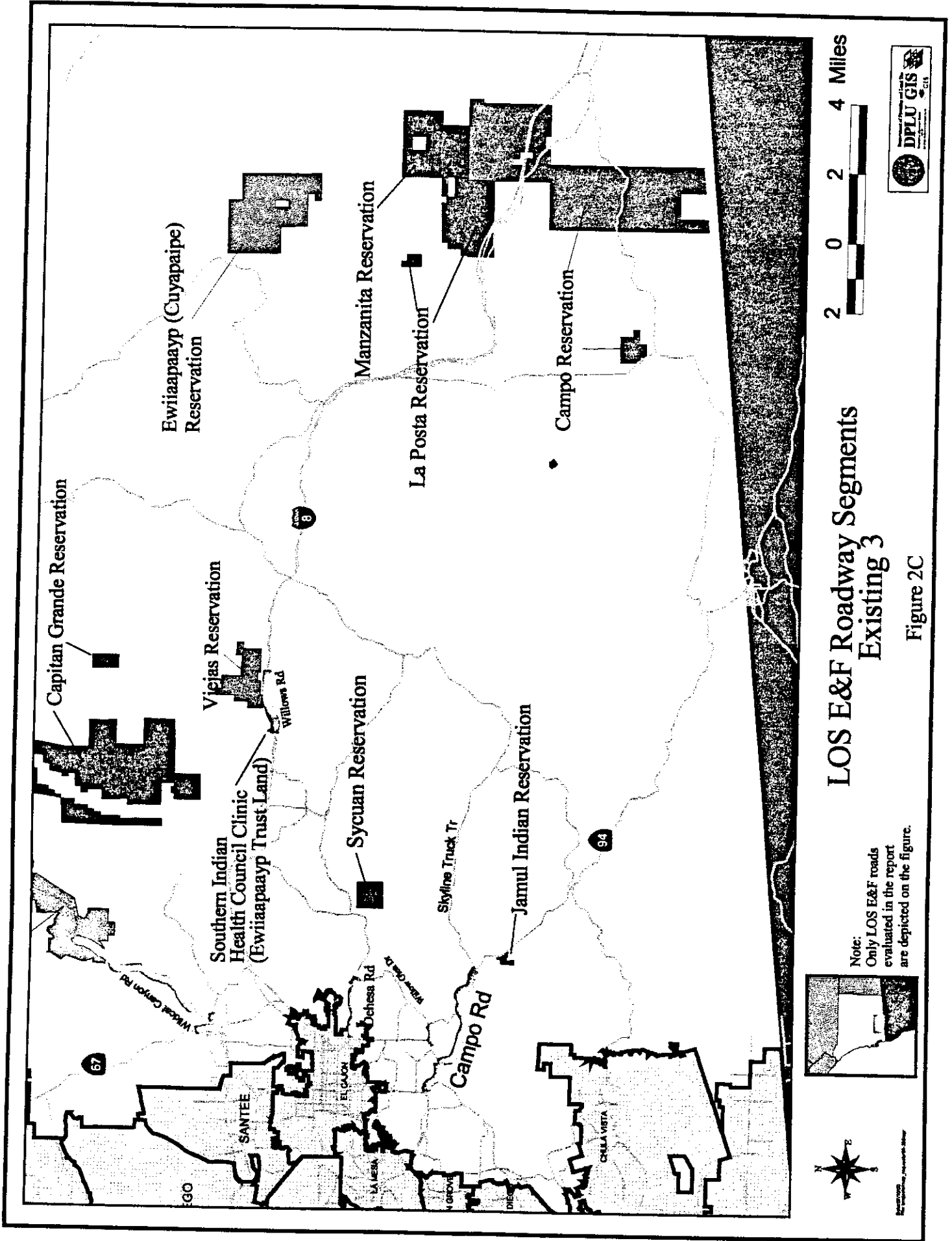
2 0 2 4 Miles

LOS E&F Roadway Segments Existing 1

Figure 2A







EXISTING PLUS PROJECT ANALYSIS

The estimated number of trips generated by each of the proposed Indian Gaming projects were hand distributed onto the adjacent road network. Levels of service for the road segments were then reassessed based upon the additional traffic volumes. A summary of the traffic volumes and level of service estimates for County-maintained arterials and State highways in the vicinity of the proposed Indian Gaming projects are provided in Table 2. Direct traffic impacts that would result from the proposed Indian Gaming facilities are as follows:

- **Barona**
 - Maplevue Street (Ashwood Street to Lake Jennings Park Road) – LOS E
 - San Vicente Road (Main Street to Gunn Stage Road) – LOS E
 - Wildcat Canyon Road (Barona Entrance to Willow Road) – LOS F
 - Willow Road (SR 67 to Wildcat Canyon Road) – LOS F
 - State Route 67 (Willow Road to Maplevue Street) – LOS F
- **Jamul**
 - Jamacha Boulevard (Sweetwater Road to Grand Avenue) – LOS E
 - Jamacha Road (Willow Glen Drive to Washington Avenue) – LOS E
 - Steele Canyon Road (Willow Glen Drive to SR 94) – LOS E/F
 - Willow Glen Drive (Steele Canyon Road to Jamacha Road/SR 54) – LOS E
 - State Route 94 (north of Avocado Boulevard to Lyons Valley Road) – LOS E
- **Pala**
 - Cole Grade Road (Cool Valley Road to Valley Center Road) – LOS E
 - State Route 76 (I-15 to Lilac Road)
- **Rincon**
 - Valley Center Road (Cole Grade Road south to Lake Wohlford Road) – LOS E/
- **San Pasqual**
 - Lake Wohlford Road (Woods Valley Road to Valley Center Road) – LOS E
 - Lilac Road (Old Castle Road to Valley Center Road) – LOS E
 - Valley Center Road (Cole Grade Road south to Lake Wohlford Road) – LOS E/F

The Pala project will also increase traffic on Pala-Temecula Road which is currently an unimproved dirt road that provides through access to the eastern portion of Temecula.

Several roadways and state highways near the proposed Indian Gaming projects are steep, narrow, and/or winding two-lane arterials or highways. These include Lake Wohlford Road, Wildcat Canyon Road, SR 76, and SR 94. Operational improvements to improve safety and traffic flow along these routes may be warranted by the existing and/or increased traffic volumes. The above rural highways were built many years ago, some were originally wagon roads paved. They were not designed to the standards we expect today regarding alignments, grades, pavement widths, shoulders, sight distances, etc.

Over the years most improvement projects on the rural highways have addressed safety and operational concerns such as intersection upgrades, curve corrections, passing lanes, adding shoulders, etc. In recent years, however, the County and Caltrans have experienced increasing difficulty in development of these operational and safety projects. This is due to the increasing environmental sensitivity in the rural corridors that are rich in biological, historical, and visual resources. Organized opposition to improvement projects from factions within the back county communities has also surfaced. For example, residents along Wildcat Canyon Road have voiced opposition to any project that would widen this road to four lanes. In addition, a "passing lanes" project on SR-94 is currently delayed as the Negative Declaration was legally challenged. Caltrans considered the elements of the suit and agreed that an EIS/EIR is the appropriate document. It is anticipated that 6 to 7 years will be required to process that document.

Intersection improvements will also be needed to improve ingress and egress from the proposed Indian Gaming properties. These improvements may include turn lanes, sight distance improvements and acceleration/deceleration lanes.

Tribes which have not submitted a specific project description to the County but have stated their intentions to develop were assessed by comparison with the above projects.

The Pauma Tribe is in the process of developing an Indian Gaming project for development. A specific proposal has not yet been provided to County staff. By comparison with the Pala project, which is adjacent to the Pauma reservation, it will likely have significant impacts to SR 76 (I-15 to Lilac Road) and Cole Grade Road (Cool Valley to Valley Center Road). It would also increase traffic on Pala-Temecula Road which is currently an unimproved dirt road that provides through access to the eastern portion of Temecula. Initial access to the proposed Indian Gaming project will use Pauma Reservation Road, which is currently on 20 feet wide.

The La Jolla Reservation is located alongside SR 76. Any future Indian Gaming facility will likely take direct access from SR 76. Impacts associated with this facility would be similar to those identified for the Pala Indian Gaming project.

Ewiiapaayp (Cuyapaipe) Tribe is in the process of developing an Indian Gaming project for development. A specific proposal has not yet been provided to County staff. Access to the project will likely be from Sunrise Highway and/or I-8 via La Posta Truck Trail Road, Thing Ranch Road, Fred Canyon/Kitchen Creek Road. Impacts would likely occur to these roads.

The Campo Indian Reservation is located between SR 94 and I 8. It has frontage on both facilities and would like take direct access to one or both of these facilities. An Indian gaming facility on this reservation would likely impact I-8 and/or SR 94.

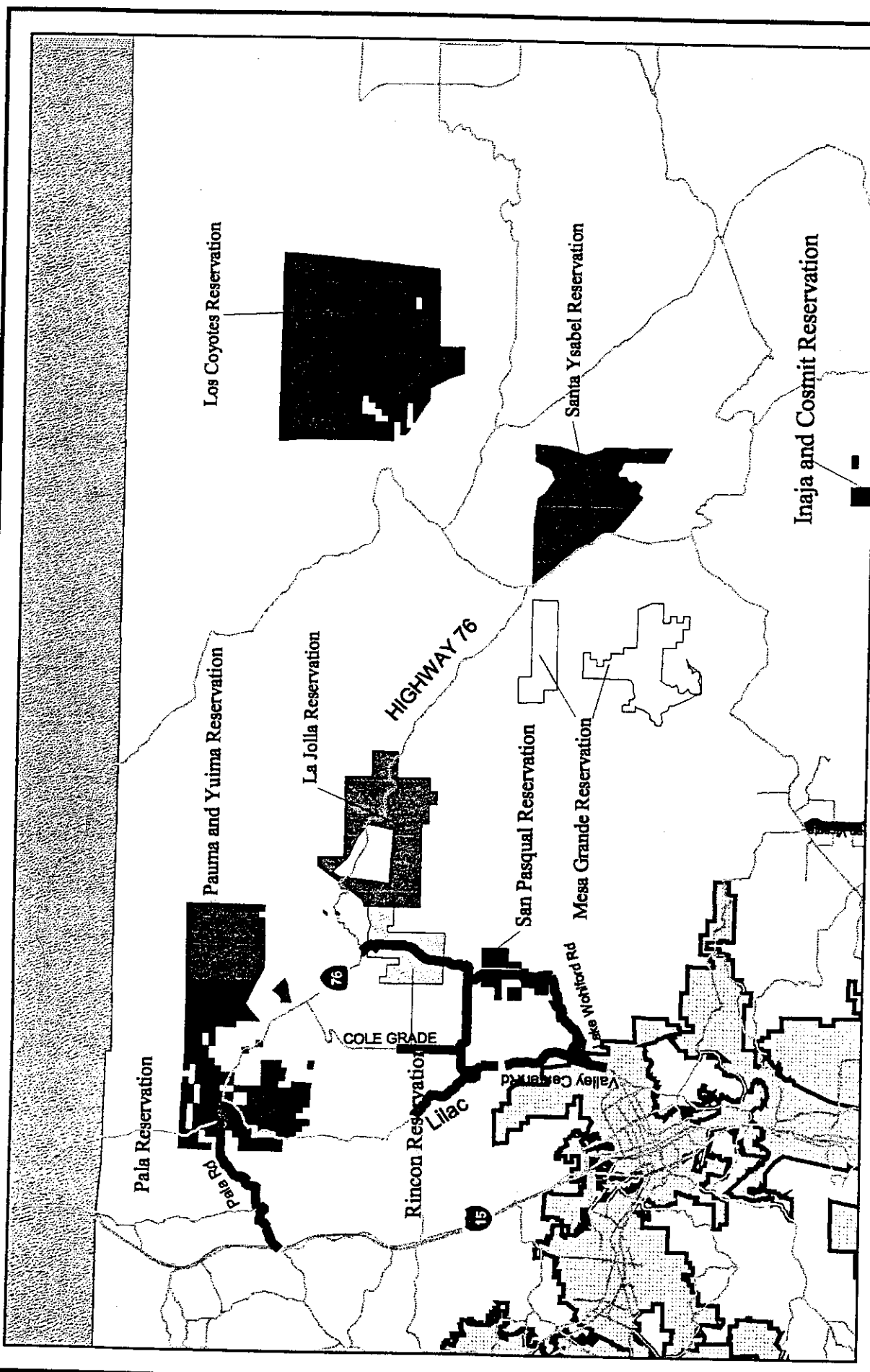
The Manzanita Indian Reservation is located north of I-8. Access to its facility may utilize roads within the Campo Reservation which is adjacent to it. It may also take access from Robinwood Road and/or McCain Valley Road. It would likely have impacts to I-8 and any County-maintained road that it would use for access.

NEAR TERM CUMULATIVE ANALYSIS

The estimated number of trips generated for the proposed Indian Gaming projects were manually distributed onto the adjacent road network. Levels of service for the road segments were then reassessed based upon the total volumes for all of the proposed Indian Gaming projects. A summary of the traffic volumes and level of service estimates for County-maintained arterials and State highways in the vicinity of the proposed Indian Gaming projects are provided in Table 2 and shown in Figure 3. Cumulative traffic impacts that would result from the proposed Indian Gaming facilities are as follows:

- **Barona**
 - No additional impacts were identified
- **Jamul**
 - No additional impacts were identified
- **Pala**
 - Lake Wohlford Road (Woods Valley Road to Valley Center Road) – LOS E
 - Lilac Road (Old Castle Road to Valley Center Road) – LOS E
 - Valley Center Road (Cole Grade Road south to Lake Wohlford Road) - LOS E/F
- **Rincon**
 - Lake Wohlford Road (Woods Valley Road to Valley Center Road) – LOS E
 - Lilac Road (Old Castle Road to Valley Center Road) – LOS E
 - Cole Grade Road (Cool Valley Road to Valley Center Road) – LOS E F
 - Valley Center Road (Cole Grade Road north east to SR 76 Pala Road) – LOS E
 - State Route 76 (I-15 to Lilac Road)
- **San Pasqual**
 - Lake Wohlford Road (Woods Valley Road to Valley Center Road) – LOS E
 - Lilac Road (Old Castle Road to Valley Center Road) – LOS E
 - Valley Center Road (Cole Grade Road south to Lake Wohlford Road) - LOS E/F
 - Cole Grade Road (Cool Valley Road to Valley Center Road) – LOS E
 - State Route 76 (I-15 to Lilac Road)

By comparison with the Pala project, the future Pauma Indian Gaming facility will likely have significant cumulative impacts to Lake Wohlford Road (Woods Valley Road to Valley Center Road), Lilac Road (Old Castle Road to Valley Center Road) and Valley Center Road (Cole Grade Road south to Lake Wohlford Road).



**LOS E&F Roadway Segments
Near Term Cumulative 1**

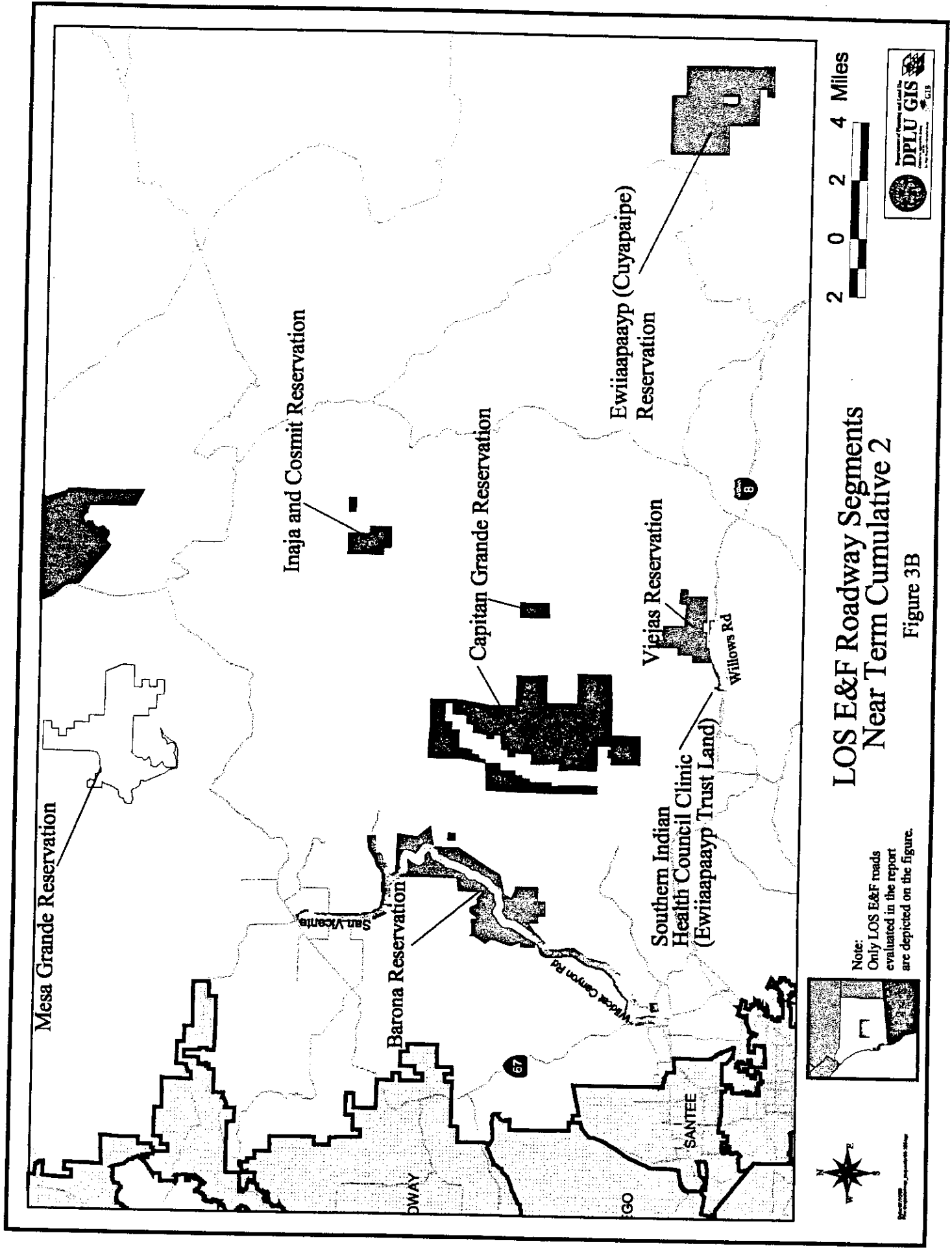


Figure 3A



Note:
Only LOS E&F roads
evaluated in the report
are depicted on the figure.

Revised: 10/10/2009



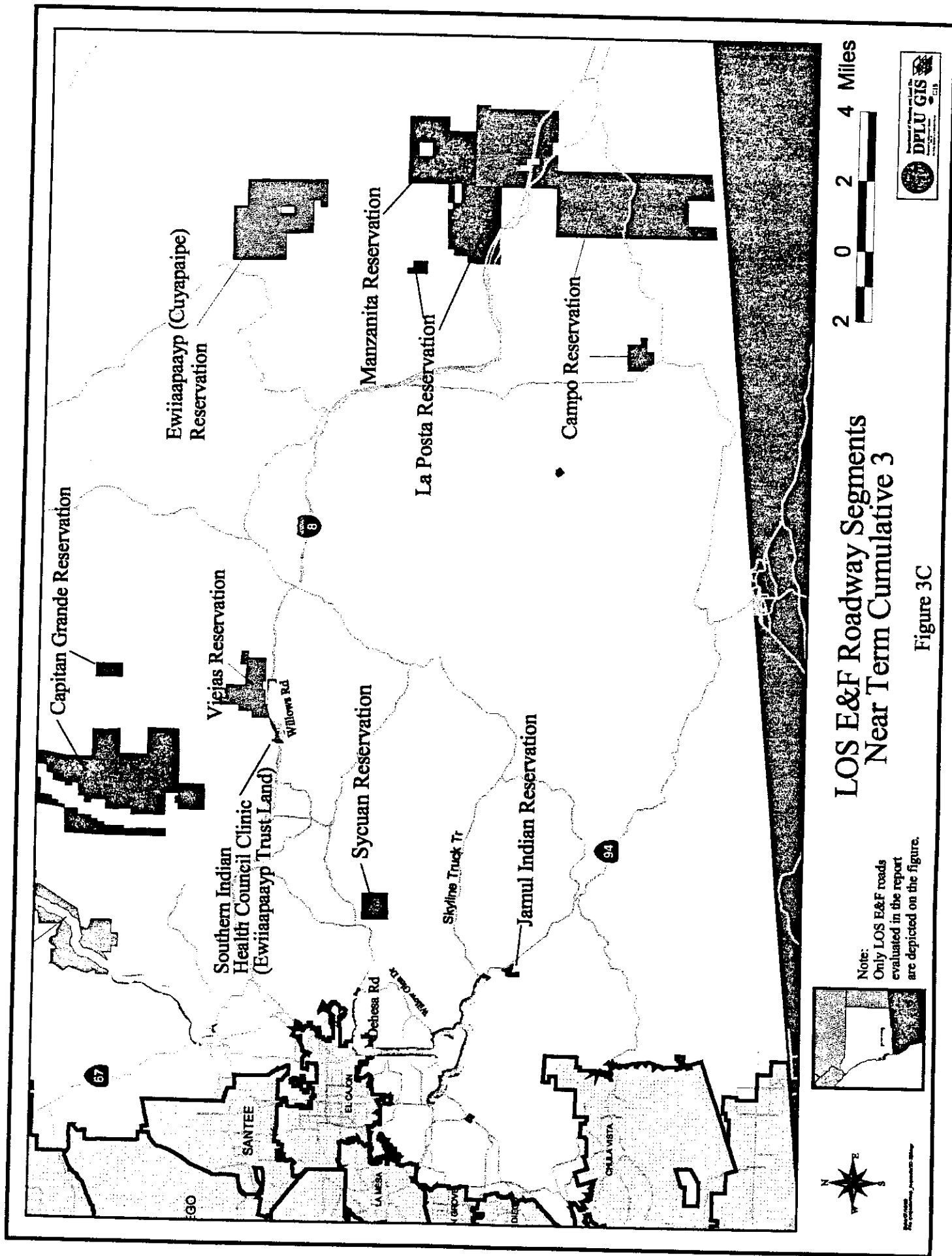


Figure 3C

IMPROVEMENTS

TIMING

Prior to construction of a road improvement project many studies must be completed. Figure 4 identifies the key steps to implement a road improvement project. These include the following; 1) identification of purpose and need, 2) Project Studies Report (for State highways) or an opportunities and constraints report (for County arterials), 3) Environmental Impact Statements/Environmental Impact Reports, 4) Preliminary Engineering, and Detailed Engineering. In addition, prior to construction required permits must be obtained, mitigation measures implemented and right-of-way acquired. It is estimated that it would take approximately 7 years to construct major improvements to a State highway and approximately 6 years to construct major improvements to a County arterial.

ESTIMATES

The length of each impacted arterial and highway segment is provided in Table 3. The total miles of impacted County-maintained arterials is 56.47 miles. The total miles impacted State highways is 17.29 miles. The number of travel lanes needed to bring the impacted arterial and highway segment to LOS D or better is also identified in Table 3. Additional studies, however, should be conducted to determine the actual improvements that will be needed.

A rough cost estimate for constructing the identified County-maintained arterial improvements was obtained by applying a cost per lane mile factor. This factor was based upon comparison with the costs of developing and constructing similar road improvements. The cost estimates are very preliminary and are based upon average costs and general assumptions. Actual costs for each improvement project will vary based upon environmental constraints, mitigation measures, engineering features, right-of way acquisitions, and other factors. Additional studies should be conducted to provide more detailed and accurate cost estimates for each project. Based upon the average length of impacted road or highway segment and a general cost per lane mile factor, estimates of the cost to construct improvements to County-maintained arterials were prepared.

A rough cost estimate for constructing the identified State highway improvements was prepared by Caltrans staff based upon the traffic volumes estimates provided in this report. These estimates were developed without detailed assessment and should be used only for planning purposes. The cost estimates include implementation costs; such as right-of-way acquisition, construction and project support (design, inspection, management, etc.) and environmental costs; such as preparation of environmental documents/studies and mitigation costs (major wetland creation, plant establishment, and land purchases for wildlife refuges). A copy of a letter from Caltrans which describes the parameters used in the preparation of the cost estimates is provided in Exhibit D.

The total cost to construct needed improvements to County arterials is \$ 167,958,000. The estimated total cost to construct improvements to the State highways is \$ 302,100,000.

FIGURE 4
State Highway / County Arterial - Roadway Improvement Process

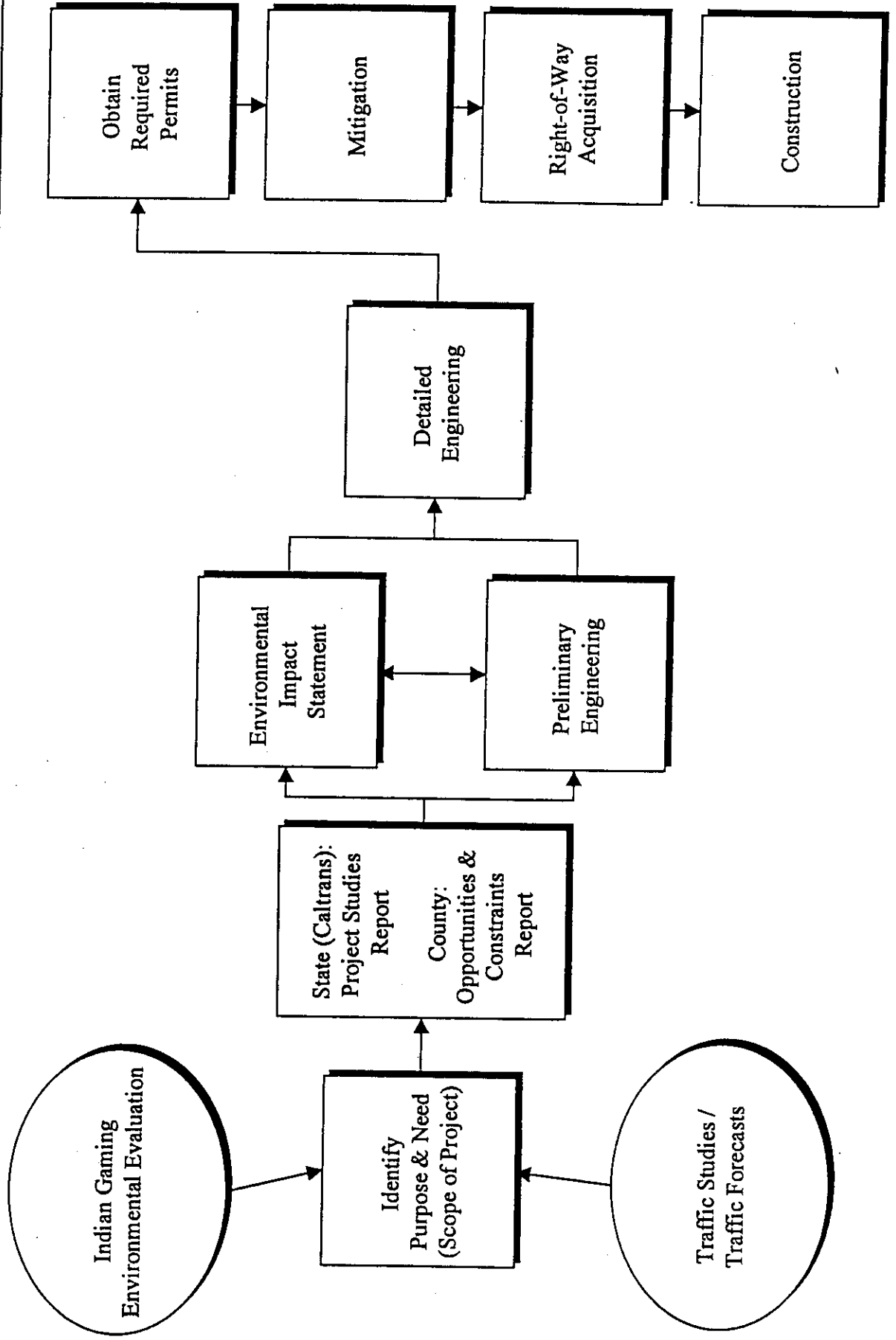


TABLE 3
Roadway Improvement Costs to Satisfy Minimum LOS of 'D'

	Road	Segment	Near-term ADT	Near-term LOS (E&F)	Length of Segment (Miles)	Lanes Needed to Accommodate Traffic	Cost Factor/Mile (x1,000)	Cost to Implement (x1,000)
BARONA								
4	Mapleview St.	Ashwood St. to Lake Jennings Park Rd.	17.7	E	0.70	2	3,600	2,520
5	San Vicente Rd/11th	Main St. to Hanson Lane	13.4	E	1.17	1	1,800	2,106
6	San Vicente Rd.	Hanson Lane to Warnock Dr.	16.4	F	0.75	2	3,600	2,700
7	San Vicente Rd.	Warnock Dr. to Wildcat Canyon Rd.	19.9	F	2.20	2	3,600	7,920
8	San Vicente Rd.	Wildcat Canyon Rd. to Gunn Stage Rd.	13.2	E	1.71	1	1,800	3,078
9	Wildcat Canyon Rd.	San Vicente Rd. to Featherstone Canyon Rd.	16.1	E	4.58	2	3,600	16,488
10	Wildcat Canyon Rd.	Featherstone Cyn Rd. to Barona Entrance	16.1	E	2.36	2	3,600	8,496
11	Wildcat Canyon Rd.	Barona Entrance to Willow Rd.	33.5	F	5.08	3	4,500	22,860
12	Willow Rd.	SR67 to Wildcat Canyon Rd.	18.8	F	0.91	2	3,600	3,276
13	SR67	Willow Rd. to Mapleview St.	43.8	F	1.22	4C	N/A	13,400
BARONA - SUBTOTALS					20.68			\$82,844
JAMUL								
1	Jamacha Blvd.	Sweetwater Rd. to Grand Ave.	32.8	E	0.79	2	3,600	2,844
2	Jamacha Blvd.	Grand Ave. to Sweetwater Springs Blvd.	31.8	E	1.89	2	3,600	6,804
4	Jamacha Rd.	Willow Glen Dr. to Hillsdale Rd.	32.1	E	1.27	2	3,600	4,572
5	Jamacha Rd.	Hillsdale Rd. to Chase Ave.	32.1	E	0.45	2	3,600	1,620
6	Jamacha Rd.	Chase Ave. to El Cajon City Limits	31.1	E	0.50	2	3,600	1,800
13	SR94	SR125 to Avocado Blvd.	66.3-92.3	D-F	3.22	2F	N/A	25,300
14	SR94 (Campo Rd.)	Avocado Blvd. to Jamacha Rd.	55.3-64.3	F	0.95	2C	N/A	9,200
15	SR94 (Campo Rd.)	Jamacha Rd. to Steele Canyon Rd.	38.1	F	2.49	4C	N/A	93,800
16	SR94 (Campo Rd.)	Steele Canyon Rd. to Lyons Valley Rd.	45.9	F	1.97	4C	N/A	57,900
17	SR94 (Campo Rd.)	Lyons Valley Rd. to Proctor Valley Rd.	39.6	F	0.37	4C	N/A	14,700
19	Steele Canyon Rd.	Willow Glen Dr. to SR94 (Campo Rd.)	10.8-16.8	E-F	1.48	2	3,600	5,328
21	Willow Glen Dr.	Steele Canyon Rd to SR54 (Jamacha Rd.)	20.1	F	0.78	2	3,600	2,808
JAMUL - SUBTOTALS					16.16			\$226,676
PALA, RINCON, SAN PASQUAL								
2	Cole Grade Rd.	Cool Valley Rd. to Fruitvale Rd.	11.9	E	1.92	1	1,800	3,456
3	Cole Grade Rd.	Fruitvale Rd. to Valley Center Rd.	13.9	E	0.66	2	3,600	2,376
4	Lake Wohlford Rd.	Valley Center Rd. to Woods Valley Rd.	11.7	E	1.87	1	1,800	3,366
5	Lake Wohlford Rd.	Woods Valley Rd. to Guejito Rd.	19.9	F	1.44	2	3,600	5,184
6	Lake Wohlford Rd.	Guejito Rd. to Escondido City Limits	19.9	F	3.30	2	3,600	11,880
10	Lilac Rd.	Old Castle Rd. to Anthony Rd.	13.1	E	1.65	1	1,800	2,970
11	Lilac Rd.	Anthony Rd. to Valley Center Rd.	13.1	E	1.69	1	1,800	3,042
16	SR76 (Pala Rd.)	I-15 to Rice Canyon Rd.	25.9	F	2.09	2C	N/A	37,000
17	SR76 (Pala Rd.)	Rice Canyon Rd. to Pala Temecula Rd.	27.1	F	4.74	2C	N/A	43,300
18	SR76 (Pala Rd.)	Pala Temecula Rd. to Lilac Rd.	27.4	F	0.24	2C	N/A	7,500
21	Valley Center Rd.	SR76 (Pala Rd.) to Lake Wohlford Rd.	12.7	E	5.00	1	1,800	9,000
22	Valley Center Rd.	Lake Wohlford Rd. to Cole Grade Rd.	12.4	E	2.91	1	1,800	5,238
23	Valley Center Rd.	Cole Grade Rd. to Lilac Rd.	23.7	F	1.28	2	3,600	4,608
24	Valley Center Rd.	Lilac Rd. to SC990(Charlan Rd)	23.0	F	0.94	2	3,600	3,384
25	Valley Center Rd.	SC990(Charlan Rd) to Escondido City Limits	22.9	F	2.94	2	3,600	10,584
PALA, RINCON, SAN PASQUAL - SUBTOTALS					32.67			\$152,888
SYCUAN								
3	Dehesa Rd.	Willow Glen Dr. to El Cajon City Line	10-12 ¹	D-E	1.98	1	1,800	3,564
SYCUAN - SUBTOTALS					1.98			\$3,564
VIEJAS								
1	Willows Rd.	West Willows Rd. to Viejas Entrance	13.4 ¹	E	2.27	1	1,800	4,086
VIEJAS - SUBTOTALS					2.27			\$4,086
ALL PROJECTS								
TOTAL MILES - STATE FACILITIES					17.28	STATE TOTAL	\$302,100	
TOTAL MILES - COUNTY FACILITIES					66.47	COUNTY TOTAL	\$167,958	
TOTAL MILES - ALL FACILITIES					73.76	GRAND TOTAL	\$470,058	

Notes: 1 = Existing ADT (Near-Term not applicable)

C = Conventional F = Freeway

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FUNDING

In the case of the County, the \$167,958,000 in estimated needed improvements is beyond the reach of what can be funded with the \$ 7 million average annual San Diego County gas tax funds available for capital improvements. TRANSNET funds from 1987 San Diego County approved Proposition A (the San Diego Transportation Improvement Program) have been fully allocated and are not available. Although an extension of the TRANSNET sales tax has been suggested by some, it can not be assumed that such an extension would provide sufficient funds. Extension of the TRANSNET sales tax will also require approval by a 2/3 vote which can not be assured.

The normal funding methods for road improvements can not meet the anticipated need for road improvements. Commitments should be obtained from the Indian Tribes for funding contributions towards the needed road improvements. These could serve as a local match to help leverage federal and/or state funding to the needed road improvements. Attempts should also be made to obtain special one-time state and/or federal funding.

FAIRSHARE

The total cost for the above projects is exorbitant. The Tribes, however, have expressed a willingness to make fair share contributions toward road improvements. Calculation of fairshare contributions toward road and highway improvements should be based upon a detailed cost estimate that has been calculated after the road improvement project has been identified, environmental constraints have been assessed and preliminary engineering/design of the road improvements prepared. The actual cost for completion of the road improvement project will vary considerably as the project is developed. Other factors should also be considered in the calculation of fairshare contributions. These include 1) the percentage of the road improvement cost that will not receive State, federal and/or County funding, 2) other development projects in the area which will generate traffic on the road or highway being improved and 3) the time frame when the construction activity will take place.

In addition, Indian Gaming projects are proposed on several locations in the North County area. Due to their proximity to one another, the potential exists for them to share in the costs for the needed road improvements. Under a "worst case scenario" fair share contributions have been estimated for each of the Tribes in the North County (Pala, Rincon, San Pasqual). In the "worst case scenario," it was assumed that no State and/or Federal funds were obtained for completion of the road improvements and that the entire cost of road improvements would be paid by the Indian Tribes. Costs were estimated for each reservation in proportion to the amount that each individual Indian Gaming project would increase the traffic volume on the road segment. Costs attributable to each of these Tribes for the needed road improvements are summarized in Table 4.

Although willing to pay their fairshare the Tribes also believe other land development projects along the rural corridors should also pay their fairshare. Contributions from future developments within the unincorporated area along the impacted corridors may also be obtained. These would be done on a project by project basis as a condition of development for those projects. It,

however, is not certain when and if these project would go forward in the near term and be subject making contributions toward road improvements.

Many existing approved projects (such as Tentative Parcel Maps, Tentative Maps and Major Use Permits) in the SR 76 corridor are not likely conditioned to make contributions toward improvements in the SR 76 corridor. SR 76 east of I-15 currently operates at LOS B. Projects previously processed in the SR 76 corridor would not likely have been conditioned to make contributions toward improving this highway segment since their projects are not likely to impact the corridor. They may, however, be conditioned to make improvements at their project access to SR 76. The ramps from SR 76 onto I-15, however, are operating at or below Los D and some projects have been conditioned to make improvements to the ramps. The existing projects can not be reconditioned unless subject to a discretionary approval at a future date. Other projects, such as the Gregory Canyon Landfill and Rosemary's Mountain Rock Quarry are in various stages of the approval process. Depending upon what stage these projects are in the approval process, contributions and/or construction toward future improvements to SR 76 may be come a condition of approval for these projects.

FEDERAL AND STATE FUNDING SOURCES

Traditionally, funding for capacity increasing projects for the San Diego Region are directed by the SANDAG and are part of the State Transportation Improvement Plan (STIP). Priorities and commitments have been established for the currently allocated State and federal funds. Improvements to rural highways, due to this expansion of Indian Gaming, would compete region-wide for additional funding as it becomes available. Potential funding sources include:

- The revenues generated from the Compacts may be another source to fund transportation infrastructure. The Tribes have established a Reservation Transportation Authority with representation from each of the Tribes. One of the goals for this group is to lobby for those funds returned and invested in the region.
- State Funding from the Interregional Improvement Plan (IIP) approved by the California Transportation Commission (CTC) may be another source of revenue appropriate to deal with the impacts.

TABLE 4
Individual Project Contribution to Roadway Improvement Costs
for Pala, Rincon and San Pasqual

Road	Segment	Existing ADT	Total Near-term ADT*	Net Project ADT Increase*	Length of Segment (Miles)	Total Cost to Implement (\$1,000)	Pala Project ADT	Pala % of Net Increase	Pala Fair Share (\$1,000)	Rincon Project ADT	Rincon % of Net Increase	Rincon Fair Share	San Pasqual Project ADT	San Pasqual % of Net Increase	San Pasqual Fair Share
PALA, RINCON, SAN PASQUAL															
1	Cole Grade Rd. to Fruitvale Rd.	10	11.9	1.9	1.92	\$3,456	1.2	63%	\$2,183	0.2	11%	\$364	0.5	26%	\$909
2	Cole Grade Rd. to Fruitvale Rd. to Valley Center Rd.	12	13.9	1.9	0.66	\$2,376	1.2	63%	\$1,501	0.2	11%	\$250	0.5	26%	\$625
3	Lake Wohlford Rd. to Valley Center Rd. to Woods Valley Rd.	4	11.7	7.8	1.87	\$3,366	0	0%	\$0	1.5	19%	\$647	6.3	81%	\$2,719
4	Lake Wohlford Rd. to Woods Valley Rd. to Guelito Rd.	2	19.9	18	1.44	\$5,184	0	0%	\$0	1.5	8%	\$432	16.5	92%	\$4,752
5	Lake Wohlford Rd. to Guelito Rd. to Valley Center Rd.	2	19.9	18	3.30	\$11,880	0	0%	\$0	1.5	8%	\$990	16.5	92%	\$10,890
6	Lilac Rd. to Old Castle Rd. to Anthony Rd.	8	13.1	4.9	1.65	\$2,970	0.7	14%	\$424	0.9	18%	\$546	3.3	67%	\$2,000
7	Lilac Rd. to Anthony Rd. to Valley Center Rd.	8	13.1	4.9	1.69	\$3,042	0.7	14%	\$435	0.9	18%	\$559	3.3	67%	\$2,049
8	SR76 (Pala Rd.) to I-15 to Rice Canyon Rd.	5	25.9	20.9	2.09	\$37,000	18.2	87%	\$32,220	0.7	3%	\$1,239	2	10%	\$3,541
9	SR76 (Pala Rd.) to Rice Canyon Rd. to Pala Temecula Rd.	5	27.1	22.1	4.74	\$43,900	19.4	89%	\$38,010	0.7	3%	\$1,371	2	9%	\$3,919
10	SR76 (Pala Rd.) to Pala Temecula Rd. to Lilac Rd.	5	27.4	22.4	0.24	\$7,500	19.4	87%	\$6,496	1	4%	\$335	2	9%	\$670
11	Valley Center Rd. to SR76 (Pala Rd.) to Lake Wohlford Rd.	3	12.7	9.8	5.00	\$9,000	1.2	12%	\$1,102	6.1	62%	\$5,602	2.5	26%	\$2,296
12	Valley Center Rd. to Lake Wohlford Rd. to Cole Grade Rd.	4	12.4	8.4	2.91	\$5,238	0	0%	\$0	4.6	55%	\$2,668	3.8	45%	\$2,370
13	Valley Center Rd. to Cole Grade Rd. to Lilac Rd.	16	23.7	7.7	1.28	\$4,608	0	0%	\$0	4.4	57%	\$2,633	3.3	43%	\$1,975
14	Valley Center Rd. to Lilac Rd. to SC990	17	23.0	5.9	0.94	\$3,384	0	0%	\$0	3.4	58%	\$1,950	2.5	42%	\$1,434
15	Valley Center Rd. to SC990 (Charlan Rd.) to Lake Wohlford Rd.	18	22.9	4.9	2.94	\$10,584	0	0%	\$0	3.4	69%	\$7,344	1.5	31%	\$3,240
STATE TOTALS						\$87,800			\$76,726			\$2,846			\$8,129
COUNTY TOTALS						\$65,088			\$5,644			\$24,185			\$35,259
GRAND TOTALS						\$152,888			\$82,370			\$27,131			\$43,387

Note: * Rounding of Individual Impacts may cause a slight difference between the Net Project Increase and the Total Near-Term ADT.

BUILD-OUT/2020 ANALYSIS

The County of San Diego's Circulation Element and Caltrans concept plans for state highways were initially prepared many years ago, before the signing of the State compacts. They did not take into account development of Indian Gaming projects on reservations in San Diego County as are currently being proposed. A build-out assessment has been provided to assist in evaluating the need to update these plans.

Build-out (Year 2020) forecast - Traffic volume data for the build-out analysis is based on traffic forecast data prepared for the General Plan (GP) 2020 update. The GP 2020 forecast data assumes build-out of the County's General Plan and Circulation Element Plan. The roadway capacity assumptions for the State Routes are based on the 2020 Regional Transportation Plan. The forecast land use database does include information describing the three currently operating gaming facilities at the Barona, Sycuan, and Viejas Indian reservations.

Build-out (Year 2020) plus projects - The build-out plus project analysis assumes the build-out conditions plus the traffic estimated to be generated by the individual Indian reservations with documented proposals to build and/or expand a gaming facility.

Build-out (Year 2020) plus cumulative Indian gaming projects - The build-out analysis plus cumulative Indian gaming projects assumes the build-out conditions plus the traffic estimated to be generated at build-out of all Indian gaming facilities with documented proposals to build and/or expand a gaming facility. Similar to the near-term analysis, proposed non-gaming projects that are not consistent with the currently adopted General Plan were not included in the build-out cumulative analysis.

The build-out (Year 2020) forecast volumes are provided in Table 5 and figure 5. Estimated number of trips generated by each of the proposed Indian Gaming projects were then hand distributed onto the adjacent ultimate (County General Plan Circulation Element) road network for the individual Indian Gaming projects. Levels of service for the road segments were then reassessed based upon the additional traffic volumes. A summary of the cumulative traffic volumes and level of service estimates for County-maintained arterials and State highways in the vicinity of the proposed Indian Gaming projects are provided in Table 5 and shown in Figure 6.

At build-out (Year 2020), several road segments are forecast to operate below the LOS D standard. These are as follows:

- **County-maintained Arterials**
 - Pala Temecula Road (SR 76 to Riverside County line) – LOS F
 - Cole Grade Road (Cool Valley to Valley Center Road) – LOSE/F
 - Valley Center Road (Lilac to Lake Wohlford Road) – LOS E/F
 - Lake Wohlford Road (Valley Center Road to Valley Center Road) – LOS F
 - Woods Valley Road (Valley Center Road to Lake Wohlford Road) – LOS D/F
 - Ashwood Street (Willow Road to Maplevue Street) – LOS F

- Wildcat Canyon Road (San Vicente Road to Willow Road) – LOS E/F
- Willow Road (SR 67 to Wildcat Canyon Road) – LOS F
- **State Highways**
 - SR 94 (Jamacha Road to Otay Lakes Road) – LOS F
 - SR 76 (I-15 to Cole Grade Road) – LOS F

During the General Plan 2020 project that is being processed by the County of San Diego, the above arterial and highway corridors should be examined to ensure the appropriate Circulation Element classification and land use pattern to ensure that the LOS D standard can be satisfied.

The Regional Metropolitan Planning Organization (SANDAG) is making a conscience effort to limit development and growth in the backcountry by advocating densification of the existing urban areas. The 20-year Regional Transportation Plan reflects this philosophy by limiting plans for funding capacity increasing improvements to the urban transportation system. There are no capacity increasing projects on the rural highways in the region. This is a result of the “Growth Management Strategy” initiative within the region. The growth management strategies of the region should also be revised to take into account the Indian Gaming projects, which are proposed, in the rural backcountry.

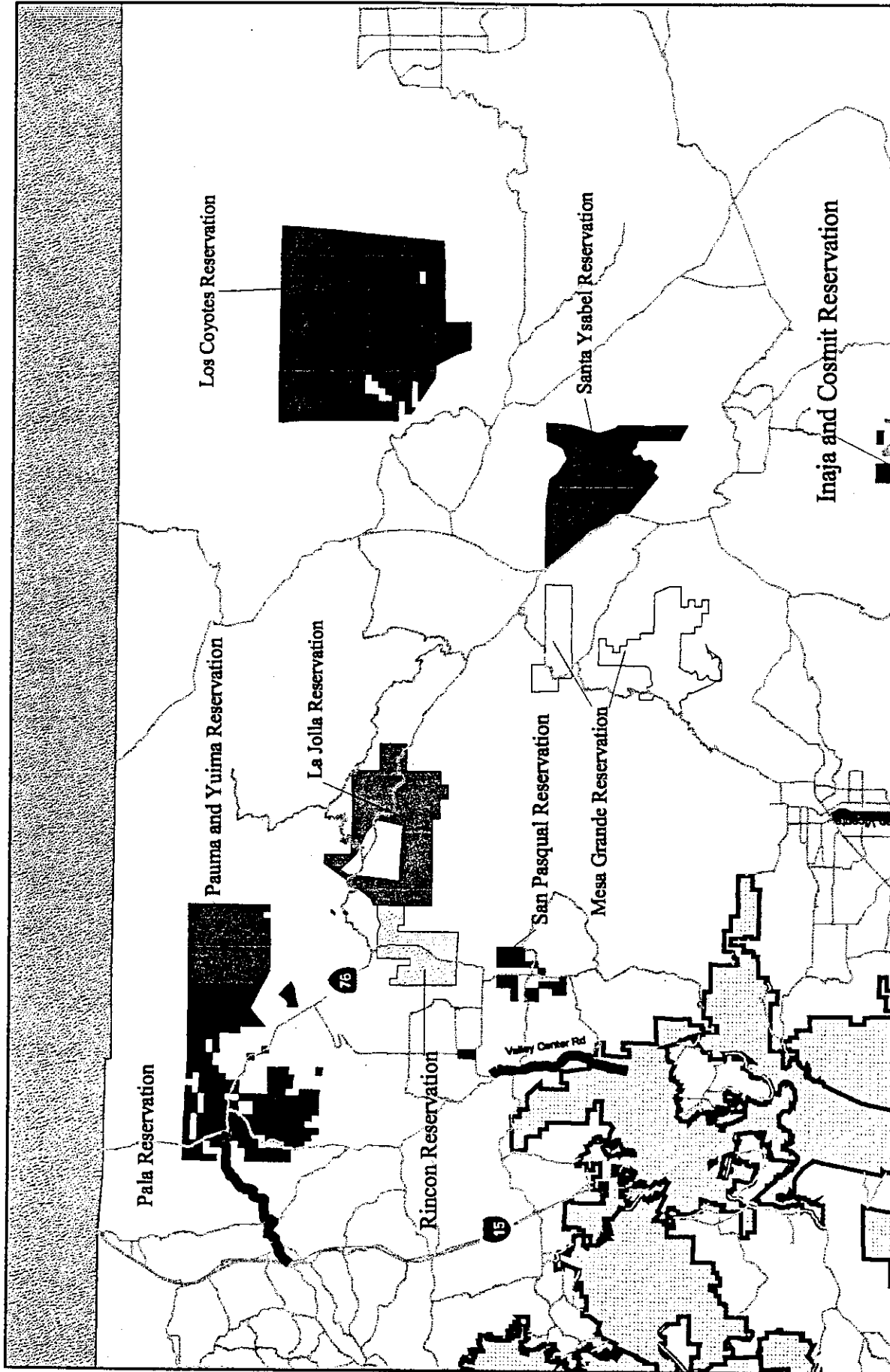
TABLE 5
Build Out, Build Out Plus Project, and Build Out Cumulative (Year 2020)
LOS E & F Roads

	Roadway	Segment	Build Out (Year 2020) ADT*	Build Out (Year 2020) LOS	Build Out (Year 2020) with Project ADT*	Build Out (Year 2020) with Project LOS	Build Out (Year 2020) Cumulative ADT*	Build Out (Year 2020) Cumulative LOS
BARONA								
1	Ashwood St.	Willow Rd. to Mapleview St.	17-18	F	22.7	F	22.7	F
9	Wildcat Canyon Rd.	San Vicente Rd. to Painted Rock Rd.	5	C	12.1	E	12.1	E
10	Wildcat Canyon Rd.	Painted Rock Rd. to Barona Entrance	10	D	17.1	F	17.1	F
11	Wildcat Canyon Rd.	Barona Entrance to Willow Rd.	20-24	F	36.5-40.5	F	36.5-40.5	F
12	Willow Rd.	SR67 to Wildcat Canyon Rd.	12-13	E	23.8-24.8	F	23.8-24.8	F
13	SR67	Willow Rd. to Mapleview St.	41	F	52.8	F	52.8	F
CAMPO								
4	SR94	La Posta Rd. to Live Oak Springs Rd.	7-19	C-F				
JAMUL								
13	SR94	SR125 to Avocado Blvd.	80-125	C-E	95.3-140.3	D-F	95.3-140.3	D-F
14	SR94 (Campo Rd.)	Avocado Blvd. to Jamacha Rd.	71	D	86.3	E	86.3	E
15	SR94 (Campo Rd.)	Jamacha Rd. to Steele Canyon Rd.	49-53	F	69.4-73.4	F	69.4-73.4	F
16	SR94 (Campo Rd.)	Steele Canyon Rd. to Lyons Valley Rd.	52-54	F	75.8-77.8	F	75.8-77.8	F
17	SR94 (Campo Rd.)	Lyons Valley Rd. to Proctor Valley Rd.	23	F	48.5	F	48.5	F
18	SR94 (Campo Rd.)	Proctor Valley Rd. to Gray Lakes Rd.	18-22	F	23.7	F	23.7	F
LA POSTA								
4	SR94	La Posta Rd. to Live Oak Springs Rd.	7-19	C-F				
MANZANITA								
4	SR94	La Posta Rd. to Live Oak Springs Rd.	7-19	C-F				
PALA								
2	Cole Grade Rd.	Cool Valley Rd. to Fruitvale Rd.	21-32	B-E	22.2-33.2	E	22.9-33.9	E
3	Cole Grade Rd.	Fruitvale Rd. to Valley Center Rd.	34	E	35.2	F	35.9	F
4	Lake Wohlford Rd.	Valley Center Rd. to Woods Valley Rd.	9	A			18.1	F
5	Lake Wohlford Rd.	Woods Valley Rd. to Guejito Rd.	20	B			35.5	F
6	Lake Wohlford Rd.	Guejito Rd. to Valley Center Rd.	24	C			39.5	F
12	Pala Temecula Rd.	RV/JS D. County Line to SR76 (Pala Rd.)	6-18	B-E	7.2-19.2	C-F	7.2-19.2	C-F
14	SR76 (Pala Rd.)	I-15 to Rice Canyon Rd.	26	F	43	F	45.7	F
15	SR76 (Pala Rd.)	Rice Canyon Rd. to Pala Temecula Rd.	21	F	39.2	F	41.9	F
16	SR76 (Pala Rd.)	Pala Temecula Rd. to Lilac Rd.	9	C	27.2	F	33.6	F
17	SR76 (Pala Rd.)	Lilac Rd. to Cole Grade Rd.	8	C	10.4	C	13.4	E
RINCON								
2	Cole Grade Rd.	Cool Valley Rd. to Fruitvale Rd.	21-32	B-E	21.2-32.2	B-E	22.9-33.9	E
3	Cole Grade Rd.	Fruitvale Rd. to Valley Center Rd.	34	E	34.2	F	35.9	F
4	Lake Wohlford Rd.	Valley Center Rd. to Woods Valley Rd.	9	A	10.5	A	18.1	F
5	Lake Wohlford Rd.	Woods Valley Rd. to Guejito Rd.	20	B	21.5	B	35.5	F
6	Lake Wohlford Rd.	Guejito Rd. to Valley Center Rd.	24	C	25.5	C	39.5	F
12	Old Castle Rd.	Lilac Rd. to Champagne Blvd.	6-10	C-D	6.2-10.2	A	7.2-11.2	D-E

TABLE 5
Build Out, Build Out Plus Project, and Build Out Cumulative (Year 2020)
LOS E & F Roads

Roadway	Segment	Build Out (Year 2020) ADT*	Build Out (Year 2020) LOS	Build Out (Year 2020) with Project ADT*	Build Out (Year 2020) with Project LOS	Build Out (Year 2020) Cumulative ADT*	Build Out (Year 2020) Cumulative LOS
16 SR76 (Pala Rd.)	I-15 to Rice Canyon Rd.	26	F	26.8	F	45.7	F
17 SR76 (Pala Rd.)	Rice Canyon Rd. to Pala Temecula Rd.	21	F	21.8	F	41.9	F
18 SR76 (Pala Rd.)	Pala Temecula Rd. to Lilac Rd.	9	C	9.8	C	33.6	F
19 SR76 (Pala Rd.)	Lilac Rd. to Cole Grade Rd.	8	C	9.0	C	13.4	E
23 SR76 (Pala Rd.)	Cole Grade Rd. to Lilac Rd.	46-47	D	51.3	E	55.7	E
24 SR76 (Pala Rd.)	Lilac Rd. to SC990	51-53	E	55.4	E	59.9	F
25 SR76 (Pala Rd.)	SC990 to Lake Wohlford Rd.	52	E	54.4	E	54.4	E
26 SR76 (Pala Rd.)	Lake Wohlford Rd. to south of Lake Wohlford Rd.	74	F	76.4	F	91.7	F
SAN PASQUAL							
2 Cole Grade Rd.	Cool Valley Rd. to Fruitvale Rd.	21-32	B-E	21.5-37.5	B-E	22.9-33.9	E
3 Cole Grade Rd.	Fruitvale Rd. to Valley Center Rd.	34	E	34.5	F	35.9	F
4 Lake Wohlford Rd.	Valley Center Rd. to Woods Valley Rd.	9	A	16.6	B-E	18.1	F
5 Lake Wohlford Rd.	Woods Valley Rd. to Guelito Rd.	20	B	34	E	35.5	F
6 Lake Wohlford Rd.	Guelito Rd. to Valley Center Rd.	24	C	38	E-F	39.5	F
7 Lilac Rd.	SR76 (Pala Rd.) to Casper Canyon Rd.	3	B	3.2	B-E	-	-
12 Old Castle Rd.	Lilac Rd. to Champagne Blvd.	6-10	C-D	7-11	C-E	7.2-11.2	D-E
16 SR76 (Pala Rd.)	I-15 to Rice Canyon Rd.	26	F	28	F	45.7	F
17 SR76 (Pala Rd.)	Rice Canyon Rd. to Pala Temecula Rd.	21	F	23	F	41.9	F
18 SR76 (Pala Rd.)	Pala Temecula Rd. to Lilac Rd.	9	C	11	D	33.6	F
19 SR76 (Pala Rd.)	Lilac Rd. to Cole Grade Rd.	8	C	10	C	13.4	E
23 SR76 (Pala Rd.)	Cole Grade Rd. to Lilac Rd.	46-47	D	51.6	E	55.7	E
24 SR76 (Pala Rd.)	Lilac Rd. to SC990	51-53	E	56.3	E	59.9	F
25 SR76 (Pala Rd.)	SC990 to Lake Wohlford Rd.	52	E	52	E	54.4	E
26 SR76 (Pala Rd.)	Lake Wohlford Rd. to south of Lake Wohlford Rd.	74	F	88	F	91.7	F
27 Woods Valley Rd.	Valley Center Rd. to Lake Wohlford Rd.	8-11	C-E	10.5-13.5	D-E	10.5-13.5	D-F
SYCUAN							
1 Delhesa Rd.	Harbison Canyon Rd. to Tavern Rd.	3-14	B-E	-	-	-	-

Notes: ADT = Average Daily Traffic / LOS = Level of Service / * = X 1,000



2 0 2 4 Miles

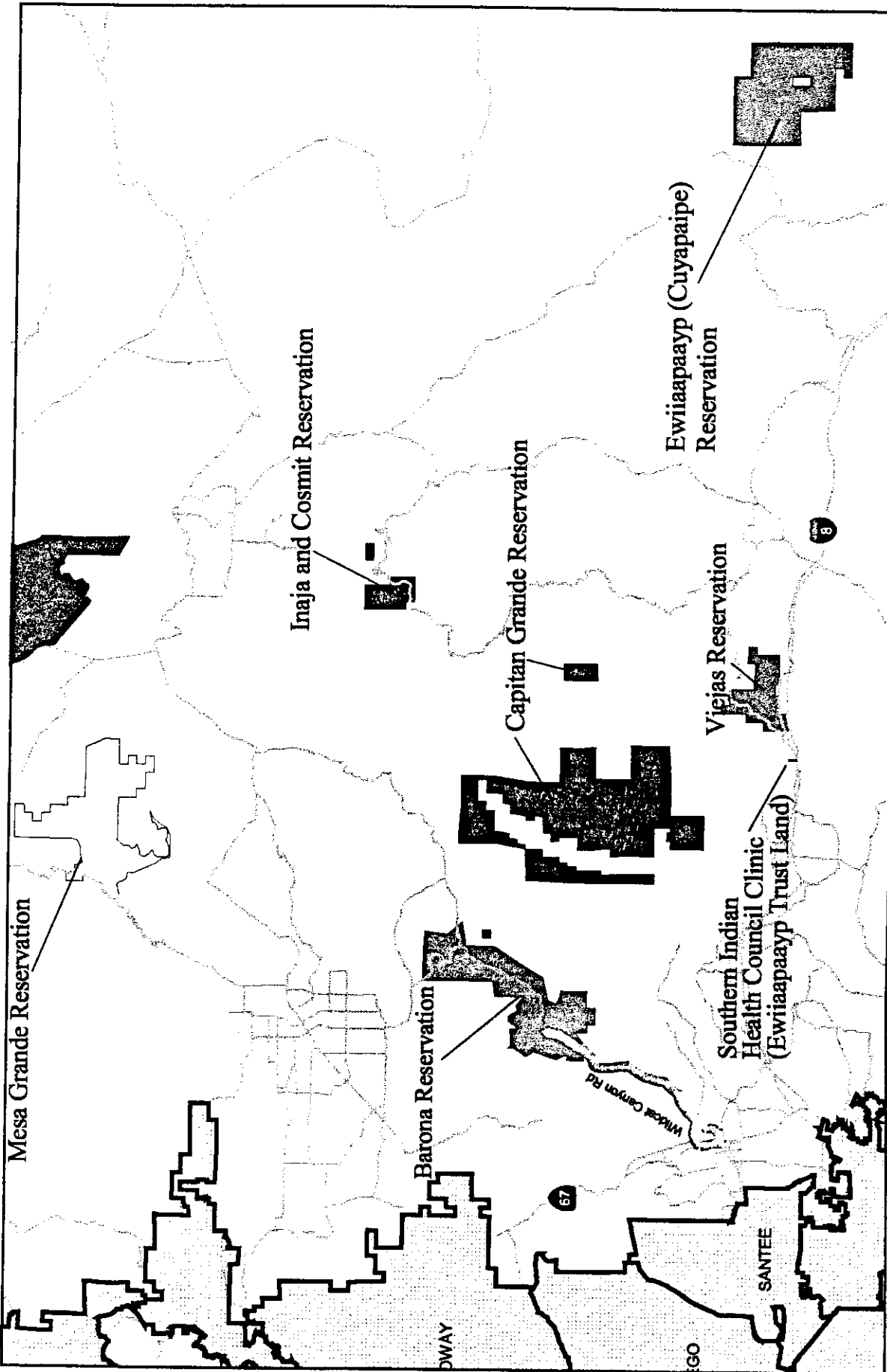


LOS E&F Roadway Segments Build Out 2020 I

Note:
Only LOS E&F roads
evaluated in the report
are depicted on the figure.



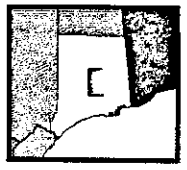
Figure 5A



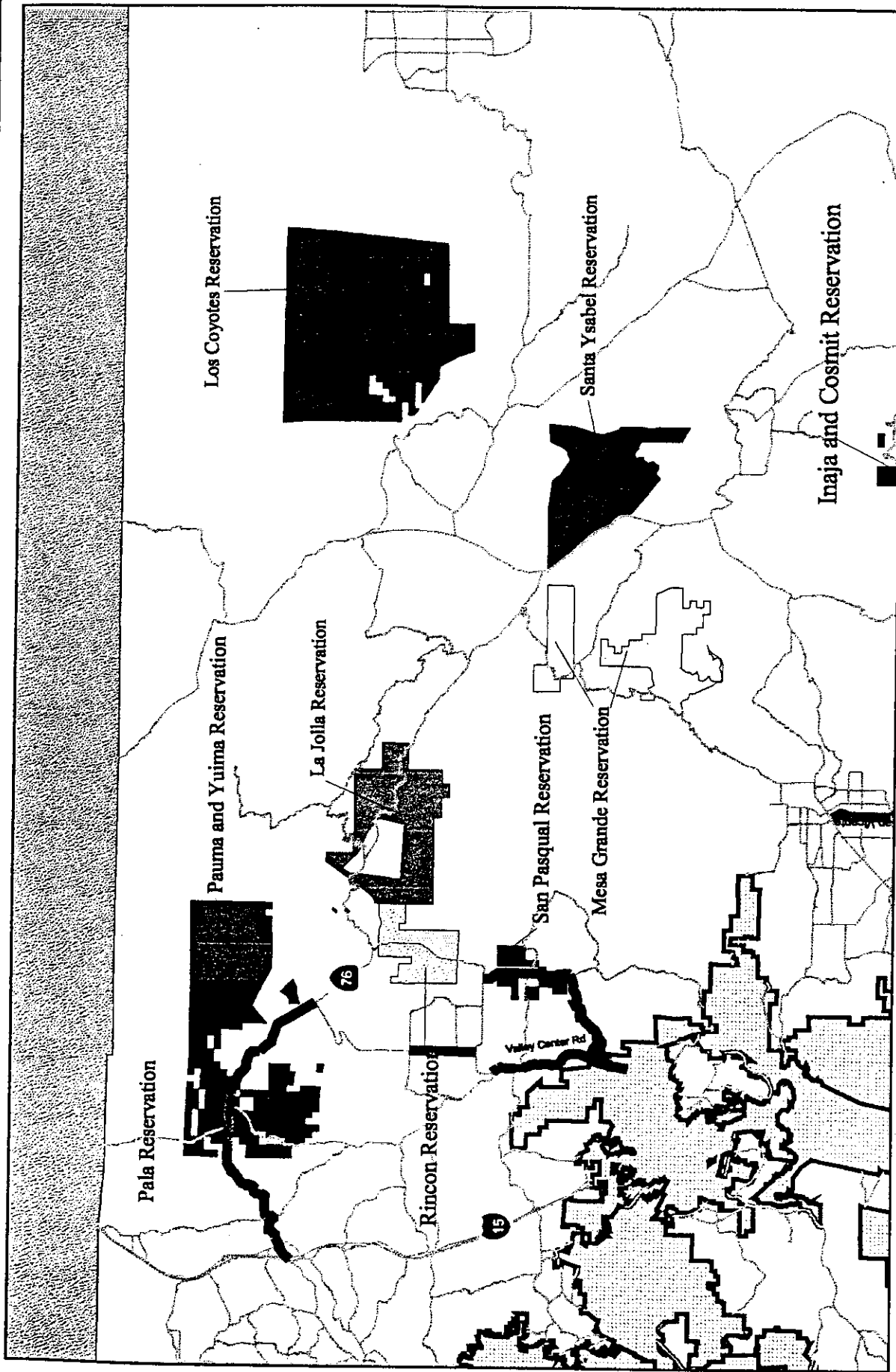
LOS E&F Roadway Segments Build Out 2020 2

Figure 5B

Note:
Only LOS E&F roads
evaluated in the report
are depicted on the figure.







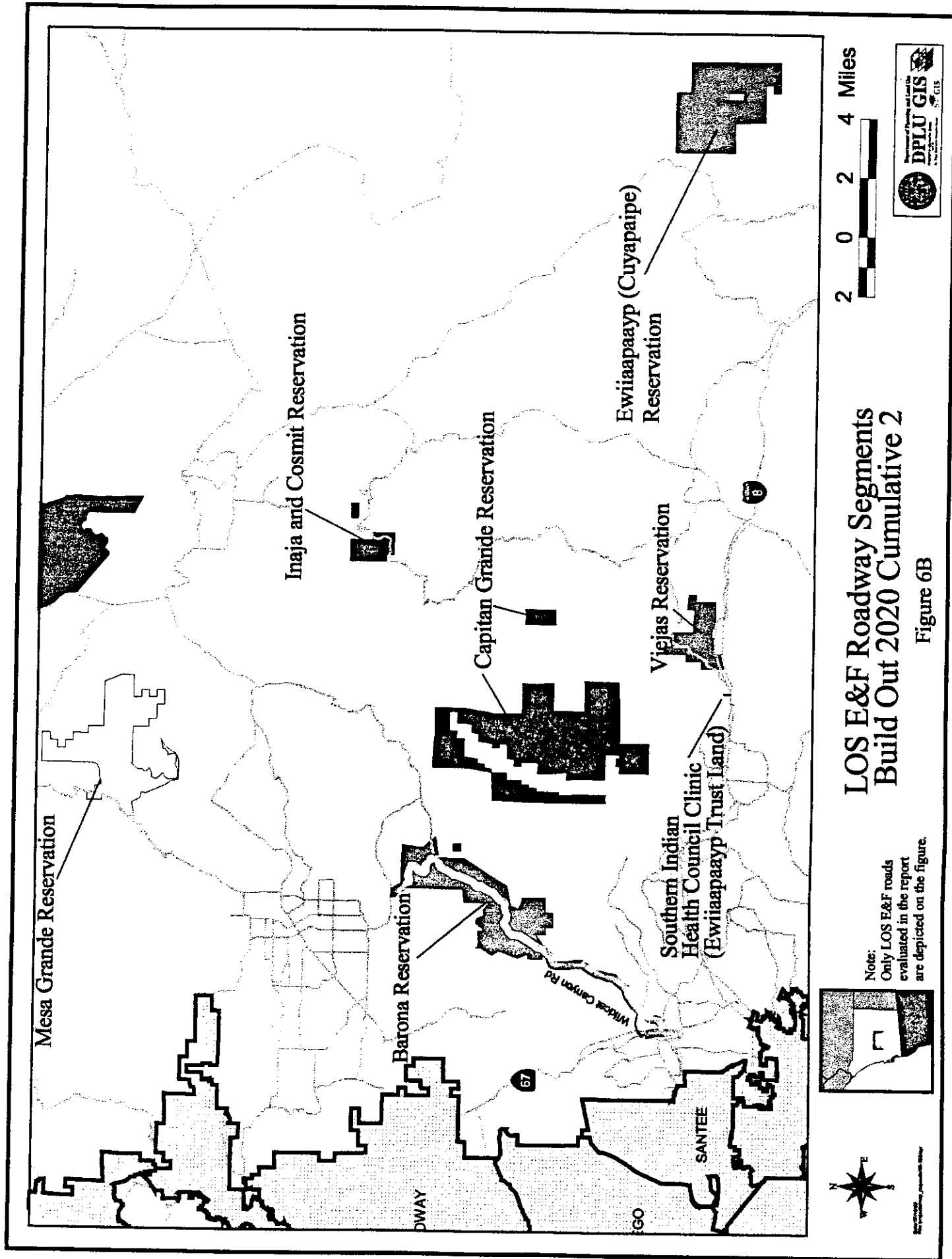
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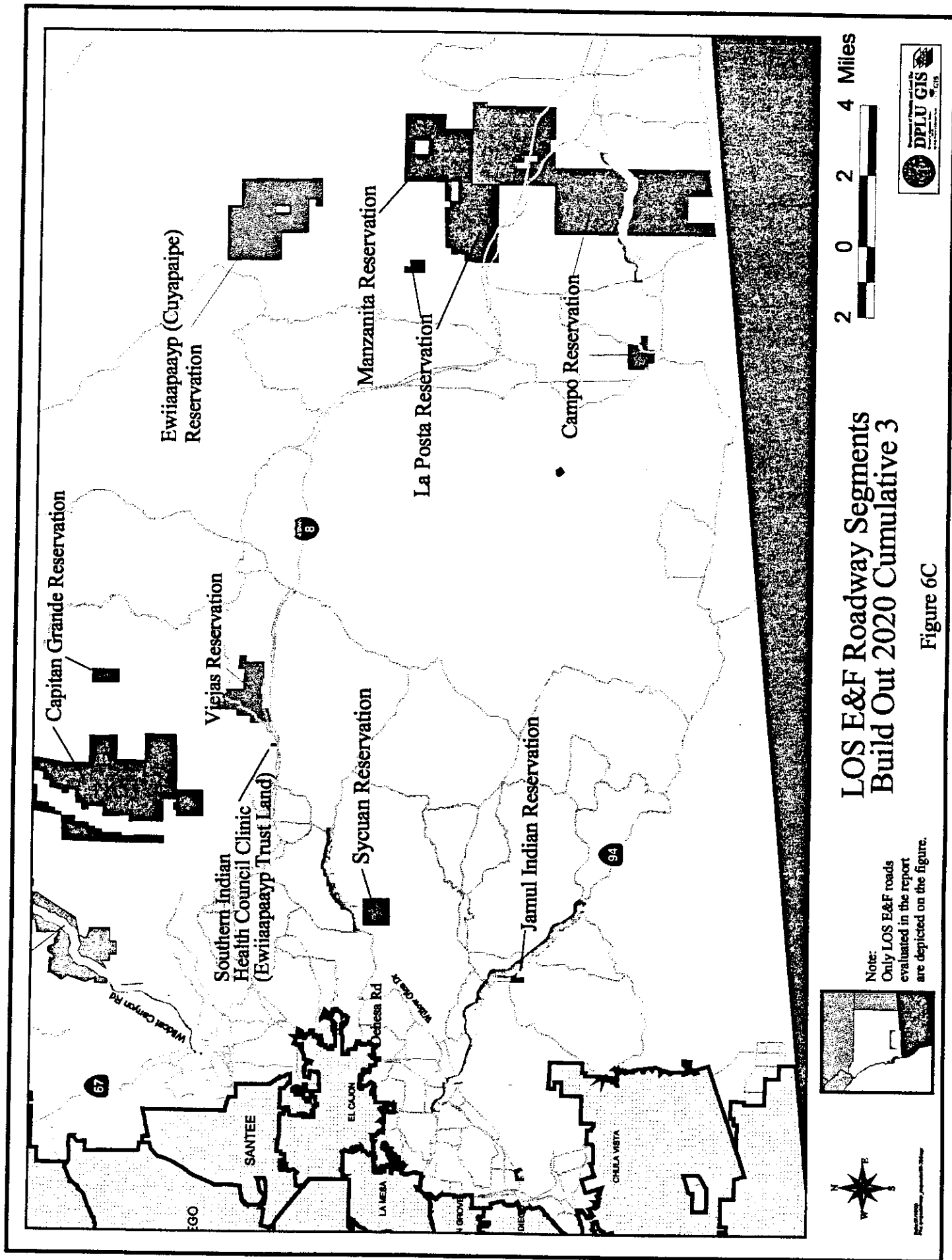
LOS E&F Roadway Segments Build Out Cumulative 2020 1

Note:
Only LOS E&F roads
evaluated in the report
are depicted on the figure.



Figure 6A





RECOMMENDATIONS

A detailed cumulative impact traffic study should be prepared to assess the near term cumulative traffic impacts of all of the proposed Indian Gaming projects. The Indian Tribes should be encouraged to collaborate on the completions of this study. The exchange of information would help each tribe complete their study and the pooling of resources would help pay for the study. The study should also be updated to account for additional projects which may be proposed in the future.

Additional studies should be conducted to better discern the trip generation and assessment assumptions utilized within this report. Trip generation rates of Indian Gaming facilities in the San Diego region should be documented and an average rate for analysis developed. Trip generation rates they may vary from facility to facility and may also vary due to the dramatic increase in the total number of facilities that will be provided in San Diego County. In addition, an evaluation should also be made to discern whether a peak hour traffic assessment would be more representative of the operations of the two-lane rural arterials servicing the proposed Indian Gaming projects.

Several rural County-maintained arterials and State highways were constructed many years ago prior to the adoption of the current highway standards. Improvements to several County-maintained arterials and State highways will be needed in the near term as the Indian Gaming projects develop. Operational and safety studies should be conducted to determine which operational and safety improvements should be implemented in the near term. Initial studies to assess the environmental and engineering constraint for road capacity improvements to impacted County arterials and State highways should also be conducted. The Indian Tribes should pay to implement these studies. These studies should include an operational study/road survey for Lake Wohlford Road and a project studies report for SR 76 east of I-15.

The County should negotiate with the Indian Tribes to obtain fairshare contributions toward road improvements to roads and highways which are impacted by the proposed Indian Gaming projects. Fairshare calculations for construction costs, however, should occur after the completion of initial studies to define the improvement projects, assess environmental constraints and prepare preliminary engineering. Implementation of the road improvement projects will take several years to complete.

The total cost of needed improvements is exorbitant. The County and Indian Tribes should actively seek State and federal funds to construct needed improvements. The County and the Tribes should collaborate on the submission of viable road improvement projects to State and Federal agencies to construct. Applications should also be submitted for federal and/or state funds to construct the needed improvements.

During the General Plan 2020 project, that is being processed by the County of San Diego, the arterial and highway corridors near the Indian Reservations should be examined to ensure the appropriate Circulation Element classification and land use pattern to ensure that the LOS D standard can be satisfied.

EXHIBITS

EXHIBIT A

Location: Wildcat s/o Vicente						Barona Volumes for Mon. 2/28/00						01450001mo		
AM Period	NB		SB			PM Period	NB		SB					
12:00-12:15	4		1			12:00-12:15	11		23					
12:15-12:30	7		2			12:15-12:30	16		21					
12:30-12:45	5		0			12:30-12:45	20		14					
12:45-1:00	9	25	3	6	31	12:45-1:00	21	68	31	89	157			
1:00-1:15	9		1			1:00-1:15	28		23					
1:15-1:30	6		1			1:15-1:30	23		23					
1:30-1:45	4		2			1:30-1:45	15		21					
1:45-2:00	4	23	2	6	29	1:45-2:00	19	85	22	89	174			
2:00-2:15	1		1			2:00-2:15	30		16					
2:15-2:30	5		1			2:15-2:30	29		24					
2:30-2:45	1		1			2:30-2:45	25		30					
2:45-3:00	5	12	0	3	15	2:45-3:00	36	120	16	86	206			
3:00-3:15	3		0			3:00-3:15	54		35					
3:15-3:30	1		1			3:15-3:30	37		27					
3:30-3:45	1		5			3:30-3:45	44		31					
3:45-4:00	2	7	6	12	19	3:45-4:00	42	177	39	132	309			
4:00-4:15	2		2			4:00-4:15	42		29					
4:15-4:30	2		7			4:15-4:30	58		31					
4:30-4:45	0		6			4:30-4:45	61		28					
4:45-5:00	3	7	15	30	37	4:45-5:00	81	242	25	113	355			
5:00-5:15	2		25			5:00-5:15	91		35					
5:15-5:30	5		31			5:15-5:30	80		28					
5:30-5:45	2		50			5:30-5:45	72		17					
5:45-6:00	6	15	46	152	167	5:45-6:00	81	324	32	112	436			
6:00-6:15	6		51			6:00-6:15	74		21					
6:15-6:30	8		81			6:15-6:30	82		25					
6:30-6:45	13		93			6:30-6:45	66		17					
6:45-7:00	16	43	82	307	350	6:45-7:00	57	279	26	89	368			
7:00-7:15	36		93			7:00-7:15	38		15					
7:15-7:30	20		76			7:15-7:30	48		17					
7:30-7:45	15		74			7:30-7:45	35		9					
7:45-8:00	22	93	63	306	399	7:45-8:00	34	155	16	57	212			
8:00-8:15	18		52			8:00-8:15	21		7					
8:15-8:30	16		65			8:15-8:30	20		6					
8:30-8:45	14		52			8:30-8:45	26		12					
8:45-9:00	14	62	34	203	265	8:45-9:00	16	83	9	34	117			
9:00-9:15	17		40			9:00-9:15	20		2					
9:15-9:30	14		32			9:15-9:30	25		9					
9:30-9:45	15		36			9:30-9:45	32		7					
9:45-10:00	10	56	29	137	193	9:45-10:00	18	95	10	28	123			
10:00-10:15	17		18			10:00-10:15	11		4					
10:15-10:30	12		23			10:15-10:30	19		6					
10:30-10:45	17		31			10:30-10:45	12		8					
10:45-11:00	12	58	23	95	153	10:45-11:00	11	53	7	25	78			
11:00-11:15	11		21			11:00-11:15	8		5					
11:15-11:30	9		20			11:15-11:30	8		3					
11:30-11:45	18		28			11:30-11:45	12		4					
11:45-12:00	17	55	27	96	151	11:45-12:00	8	36	4	16	52			
Total Vol	456		1353		1809		1717		870		2587			
Daily Totals							2173		2223		4396			

Location: Wildcat s/o Vicente Rd.			Barona			Volumes for Tues. 2/22/00			01450001tu		
AM Period	NB	SB				PM Period	NB	SB			
12:00-12:15	5	2				12:00-12:15	23	17			
12:15-12:30	6	4				12:15-12:30	23	24			
12:30-12:45	12	4				12:30-12:45	21	17			
12:45-1:00	9	32	3	13	45	12:45-1:00	19	86	23	81	167
1:00-1:15	3	1				1:00-1:15	18	20			
1:15-1:30	8	2				1:15-1:30	26	24			
1:30-1:45	3	3				1:30-1:45	26	27			
1:45-2:00	6	20	3	9	29	1:45-2:00	23	93	21	92	185
2:00-2:15	5	1				2:00-2:15	30	21			
2:15-2:30	3	0				2:15-2:30	28	23			
2:30-2:45	5	2				2:30-2:45	29	18			
2:45-3:00	5	18	2	5	23	2:45-3:00	30	117	35	97	214
3:00-3:15	3	0				3:00-3:15	42	26			
3:15-3:30	1	0				3:15-3:30	32	32			
3:30-3:45	2	7				3:30-3:45	41	26			
3:45-4:00	3	9	6	13	22	3:45-4:00	45	160	38	122	282
4:00-4:15	1	1				4:00-4:15	64	27			
4:15-4:30	2	11				4:15-4:30	42	33			
4:30-4:45	0	7				4:30-4:45	78	37			
4:45-5:00	4	7	11	30	37	4:45-5:00	88	272	45	142	414
5:00-5:15	4	22				5:00-5:15	76	30			
5:15-5:30	3	32				5:15-5:30	73	20			
5:30-5:45	6	42				5:30-5:45	88	22			
5:45-6:00	6	19	49	145	164	5:45-6:00	72	309	24	96	405
6:00-6:15	9	63				6:00-6:15	76	26			
6:15-6:30	12	76				6:15-6:30	71	21			
6:30-6:45	12	103				6:30-6:45	63	23			
6:45-7:00	24	57	99	341	398	6:45-7:00	81	291	20	90	381
7:00-7:15	25	71				7:00-7:15	62	13			
7:15-7:30	20	76				7:15-7:30	49	17			
7:30-7:45	25	79				7:30-7:45	35	11			
7:45-8:00	23	93	78	304	397	7:45-8:00	35	181	10	51	232
8:00-8:15	16	46				8:00-8:15	27	14			
8:15-8:30	17	60				8:15-8:30	29	8			
8:30-8:45	11	67				8:30-8:45	29	5			
8:45-9:00	16	60	46	219	279	8:45-9:00	20	105	7	34	139
9:00-9:15	14	54				9:00-9:15	32	8			
9:15-9:30	19	29				9:15-9:30	17	8			
9:30-9:45	13	30				9:30-9:45	21	9			
9:45-10:00	14	60	33	146	206	9:45-10:00	25	95	12	37	132
10:00-10:15	19	28				10:00-10:15	11	11			
10:15-10:30	9	20				10:15-10:30	19	12			
10:30-10:45	18	29				10:30-10:45	13	8			
10:45-11:00	9	55	28	105	160	10:45-11:00	18	61	6	37	98
11:00-11:15	19	22				11:00-11:15	10	11			
11:15-11:30	21	21				11:15-11:30	4	4			
11:30-11:45	19	24				11:30-11:45	5	5			
11:45-12:00	19	78	33	100	178	11:45-12:00	8	27	2	22	49
Total Vol	508	1430		1938			1797	901		2698	
Daily Totals							2305	2331		4636	

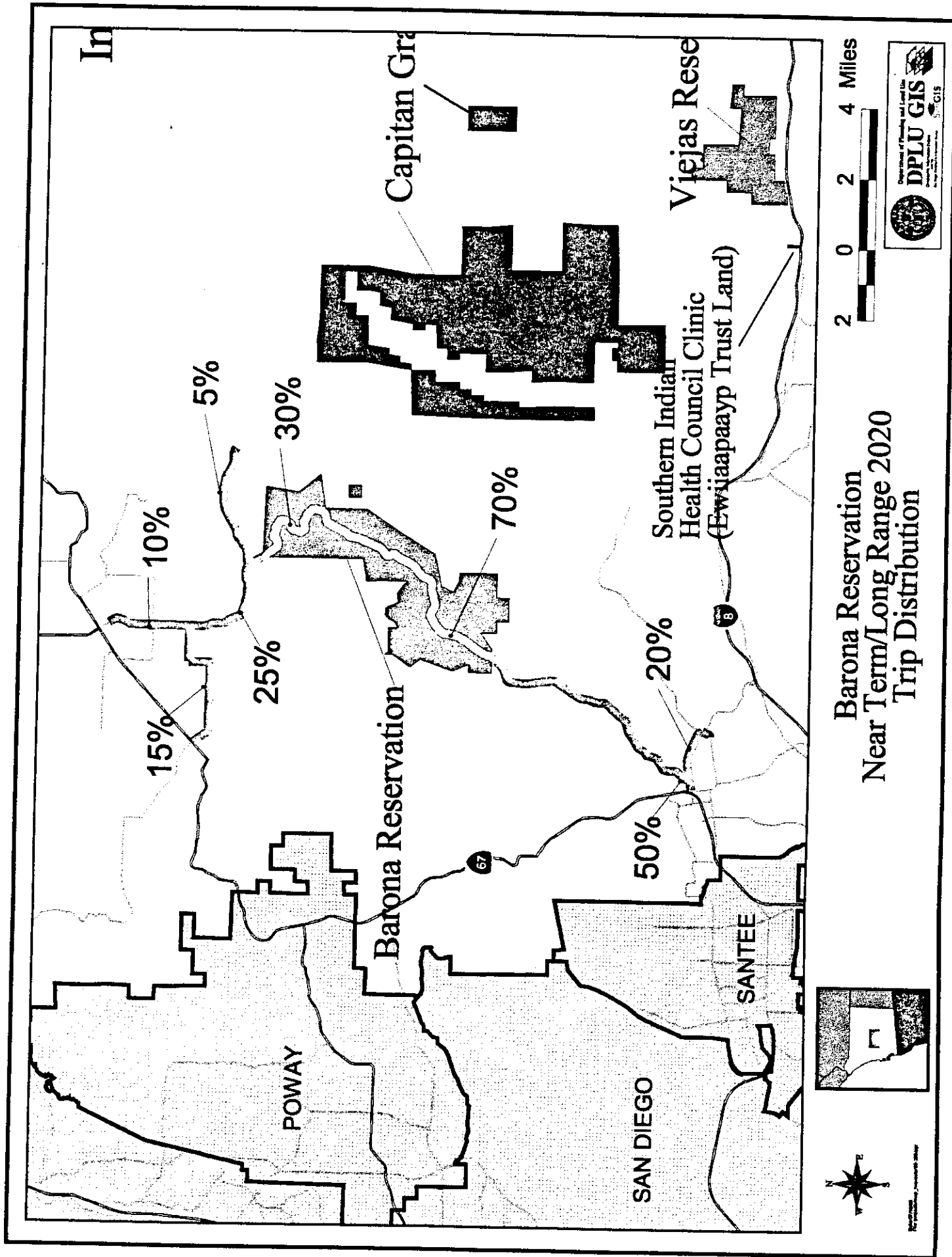
Location: Wildcat s/o Vicente Rd.					Barona Volumes for Wed. 2/23/00					01450001we				
AM Period	NB		SB			PM Period	NB		SB					
12:00-12:15	8		2			12:00-12:15	15		22					
12:15-12:30	9		2			12:15-12:30	20		17					
12:30-12:45	9		2			12:30-12:45	15		26					
12:45-1:00	9	35	2	8	43	12:45-1:00	18	68	19	84	152			
1:00-1:15	11		4			1:00-1:15	20		23					
1:15-1:30	6		1			1:15-1:30	20		31					
1:30-1:45	5		3			1:30-1:45	18		27					
1:45-2:00	1	23	2	10	33	1:45-2:00	30	88	31	112	200			
2:00-2:15	5		2			2:00-2:15	31		20					
2:15-2:30	3		1			2:15-2:30	32		24					
2:30-2:45	7		1			2:30-2:45	40		32					
2:45-3:00	2	17	1	5	22	2:45-3:00	38	141	21	97	238			
3:00-3:15	1		0			3:00-3:15	40		30					
3:15-3:30	0		4			3:15-3:30	45		36					
3:30-3:45	4		2			3:30-3:45	50		41					
3:45-4:00	2	7	4	10	17	3:45-4:00	51	186	30	137	323			
4:00-4:15	3		2			4:00-4:15	60		33					
4:15-4:30	1		9			4:15-4:30	65		22					
4:30-4:45	4		6			4:30-4:45	71		21					
4:45-5:00	1	9	16	33	42	4:45-5:00	78	274	22	98	372			
5:00-5:15	5		18			5:00-5:15	80		29					
5:15-5:30	7		34			5:15-5:30	85		35					
5:30-5:45	7		49			5:30-5:45	90		23					
5:45-6:00	5	24	57	158	182	5:45-6:00	101	356	19	106	462			
6:00-6:15	7		52			6:00-6:15	88		15					
6:15-6:30	11		74			6:15-6:30	90		16					
6:30-6:45	16		79			6:30-6:45	78		9					
6:45-7:00	19	53	92	297	350	6:45-7:00	85	341	10	50	391			
7:00-7:15	22		62			7:00-7:15	60		8					
7:15-7:30	23		74			7:15-7:30	61		13					
7:30-7:45	23		74			7:30-7:45	55		14					
7:45-8:00	23	91	84	294	385	7:45-8:00	30	206	5	40	246			
8:00-8:15	15		52			8:00-8:15	30		10					
8:15-8:30	22		63			8:15-8:30	22		11					
8:30-8:45	12		62			8:30-8:45	21		9					
8:45-9:00	15	64	51	228	292	8:45-9:00	18	91	9	39	130			
9:00-9:15	10		42			9:00-9:15	10		7					
9:15-9:30	14		37			9:15-9:30	15		9					
9:30-9:45	22		31			9:30-9:45	12		6					
9:45-10:00	12	58	18	128	186	9:45-10:00	19	56	6	28	84			
10:00-10:15	14		30			10:00-10:15	15		5					
10:15-10:30	18		23			10:15-10:30	18		8					
10:30-10:45	18		27			10:30-10:45	20		6					
10:45-11:00	25	75	25	105	180	10:45-11:00	10	63	3	22	85			
11:00-11:15	35		21			11:00-11:15	15		4					
11:15-11:30	30		24			11:15-11:30	10		2					
11:30-11:45	22		21			11:30-11:45	11		5					
11:45-12:00	25	112	18	84	196	11:45-12:00	11	47	2	13	60			
Total Vol	568		1360		1928		1917		826		2743			
Daily Totals							2485		2186		4671			

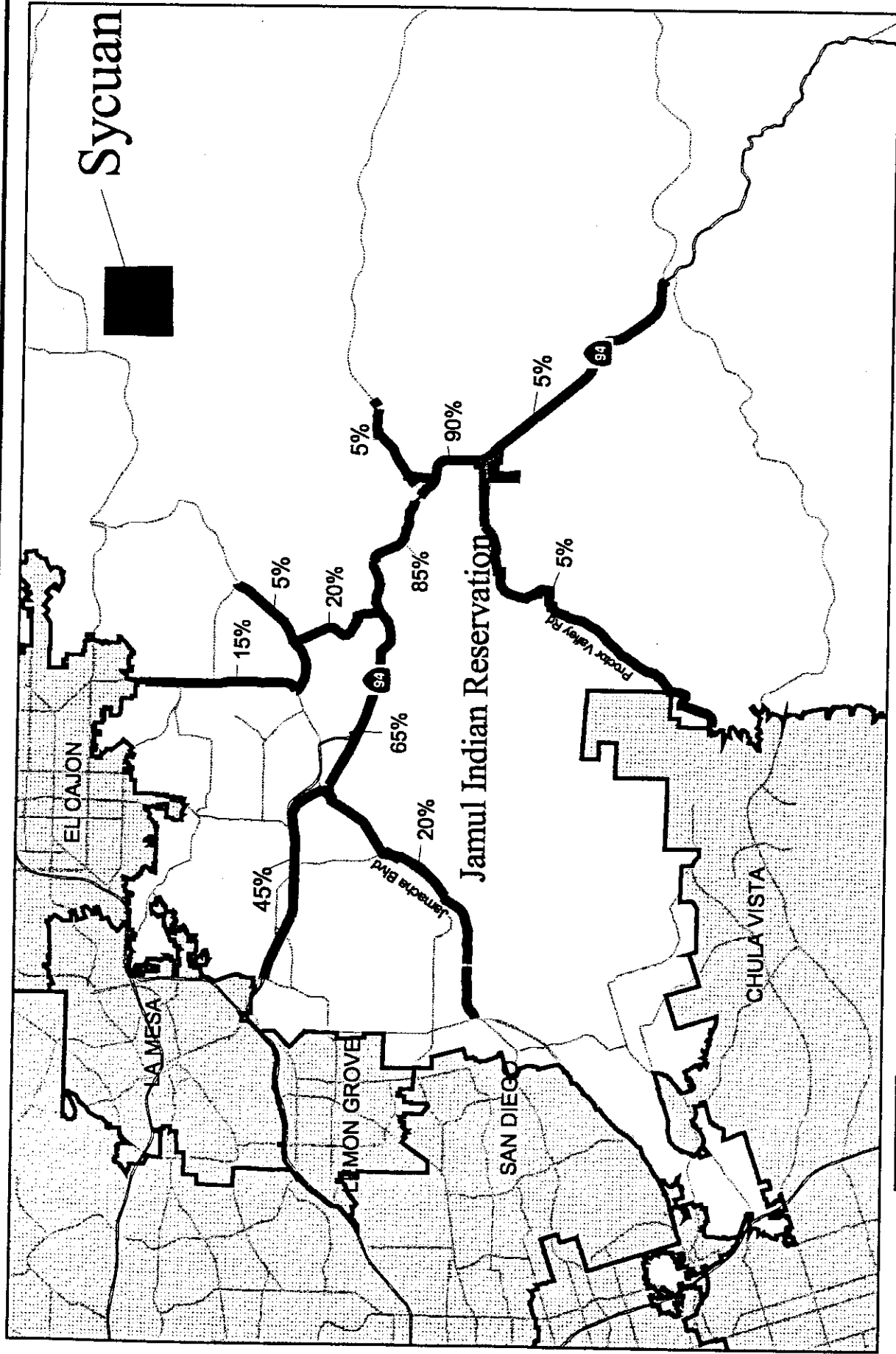
Location: Wildcat s/o Vicente					Barona Volumes for Thurs, 2/24/00					01450001th				
AM Period	NB		SB		PM Period					NB		SB		
12:00-12:15	0		0		12:00-12:15	19				14				
12:15-12:30	0		1		12:15-12:30	14				27				
12:30-12:45	0		0		12:30-12:45	15				23				
12:45-1:00	0	0	1	2	2	12:45-1:00	17	65		16	80	145		
1:00-1:15	0		1			1:00-1:15	21			13				
1:15-1:30	1		1			1:15-1:30	19			32				
1:30-1:45	2		5			1:30-1:45	25			34				
1:45-2:00	3	6	2	9	15	1:45-2:00	31	96		31	110	206		
2:00-2:15	5		2			2:00-2:15	30			18				
2:15-2:30	4		0			2:15-2:30	30			19				
2:30-2:45	6		1			2:30-2:45	33			32				
2:45-3:00	5	20	1	4	24	2:45-3:00	48	141		34	103	244		
3:00-3:15	4		0			3:00-3:15	38			26				
3:15-3:30	3		1			3:15-3:30	40			37				
3:30-3:45	5		6			3:30-3:45	53			38				
3:45-4:00	4	16	0	7	23	3:45-4:00	49	180		28	129	309		
4:00-4:15	6		2			4:00-4:15	45			29				
4:15-4:30	2		7			4:15-4:30	66			37				
4:30-4:45	4		6			4:30-4:45	75			28				
4:45-5:00	6	18	9	24	42	4:45-5:00	72	258		40	134	392		
5:00-5:15	5		19			5:00-5:15	84			42				
5:15-5:30	6		36			5:15-5:30	84			24				
5:30-5:45	4		39			5:30-5:45	90			23				
5:45-6:00	6	21	57	151	172	5:45-6:00	80	338		27	116	454		
6:00-6:15	7		60			6:00-6:15	90			35				
6:15-6:30	6		66			6:15-6:30	78			22				
6:30-6:45	5		109			6:30-6:45	61			37				
6:45-7:00	10	28	82	317	345	6:45-7:00	60	289		15	109	398		
7:00-7:15	24		71			7:00-7:15	54			10				
7:15-7:30	21		70			7:15-7:30	38			18				
7:30-7:45	19		74			7:30-7:45	29			18				
7:45-8:00	16	80	70	285	365	7:45-8:00	42	163		11	57	220		
8:00-8:15	17		62			8:00-8:15	35			14				
8:15-8:30	22		59			8:15-8:30	38			17				
8:30-8:45	24		47			8:30-8:45	19			9				
8:45-9:00	19	82	51	219	301	8:45-9:00	23	115		7	47	162		
9:00-9:15	14		52			9:00-9:15	19			10				
9:15-9:30	17		36			9:15-9:30	24			13				
9:30-9:45	14		24			9:30-9:45	20			11				
9:45-10:00	15	60	30	142	202	9:45-10:00	30	93		10	44	137		
10:00-10:15	17		28			10:00-10:15	27			13				
10:15-10:30	17		33			10:15-10:30	17			6				
10:30-10:45	14		27			10:30-10:45	18			6				
10:45-11:00	17	65	26	114	179	10:45-11:00	16	78		6	31	109		
11:00-11:15	21		23			11:00-11:15	13			7				
11:15-11:30	20		27			11:15-11:30	17			5				
11:30-11:45	16		17			11:30-11:45	11			11				
11:45-12:00	15	72	26	93	165	11:45-12:00	9	50		6	29	79		
Total Vol	468		1367		1835		1866			989		2855		
Daily Totals							2334			2356		4690		

Location: Wildcat s/o Vicente					Barona Volumes for Fri. 2/25/00					01450001fr				
AM Period		NB		SB		PM Period		NB		SB				
12:00-12:15		10		2		12:00-12:15		24		25				
12:15-12:30		11		4		12:15-12:30		17		31				
12:30-12:45		12		3		12:30-12:45		27		27				
12:45-1:00		8		41		12:45-1:00		22		90		24		107 197
1:00-1:15		6		4		1:00-1:15		27		23				
1:15-1:30		4		4		1:15-1:30		22		25				
1:30-1:45		9		3		1:30-1:45		22		30				
1:45-2:00		8		27		1:45-2:00		23		94		20		98 192
2:00-2:15		4		4		2:00-2:15		35		26				
2:15-2:30		6		1		2:15-2:30		31		28				
2:30-2:45		8		1		2:30-2:45		39		38				
2:45-3:00		1		19		2:45-3:00		39		144		33		125 269
3:00-3:15		3		1		3:00-3:15		53		31				
3:15-3:30		3		2		3:15-3:30		39		42				
3:30-3:45		5		8		3:30-3:45		58		37				
3:45-4:00		2		13		3:45-4:00		46		196		35		145 341
4:00-4:15		3		1		4:00-4:15		51		34				
4:15-4:30		4		7		4:15-4:30		70		24				
4:30-4:45		3		2		4:30-4:45		65		44				
4:45-5:00		4		14		4:45-5:00		63		249		45		147 396
5:00-5:15		5		15		5:00-5:15		89		29				
5:15-5:30		5		33		5:15-5:30		67		35				
5:30-5:45		3		32		5:30-5:45		87		41				
5:45-6:00		6		19		5:45-6:00		84		327		27		132 459
6:00-6:15		8		48		6:00-6:15		80		35				
6:15-6:30		14		67		6:15-6:30		76		32				
6:30-6:45		15		89		6:30-6:45		49		32				
6:45-7:00		28		65		6:45-7:00		57		262		26		125 387
7:00-7:15		20		84		7:00-7:15		49		21				
7:15-7:30		32		68		7:15-7:30		38		27				
7:30-7:45		23		55		7:30-7:45		32		18				
7:45-8:00		18		93		7:45-8:00		29		148		7		73 221
8:00-8:15		30		50		8:00-8:15		35		13				
8:15-8:30		12		59		8:15-8:30		28		12				
8:30-8:45		15		65		8:30-8:45		33		13				
8:45-9:00		15		72		8:45-9:00		31		127		15		53 180
9:00-9:15		14		41		9:00-9:15		29		9				
9:15-9:30		24		34		9:15-9:30		16		5				
9:30-9:45		12		33		9:30-9:45		24		9				
9:45-10:00		21		71		9:45-10:00		26		95		11		34 129
10:00-10:15		16		30		10:00-10:15		20		12				
10:15-10:30		16		35		10:15-10:30		25		7				
10:30-10:45		22		26		10:30-10:45		37		10				
10:45-11:00		15		69		10:45-11:00		16		98		13		42 140
11:00-11:15		23		20		11:00-11:15		20		9				
11:15-11:30		16		20		11:15-11:30		17		6				
11:30-11:45		20		24		11:30-11:45		22		14				
11:45-12:00		21		80		11:45-12:00		14		73		13		42 115
Total Vol		583		1324				1903		1123				3026
Daily Totals								2486		2447				4933

Location: Wildcat s/o Vicente				Barona Volumes for Sat. 2/26/00				01450001sa			
AM Period	NB		SB		PM Period		NB		SB		
12:00-12:15	10		4		12:00-12:15	46		39			
12:15-12:30	18		8		12:15-12:30	48		47			
12:30-12:45	19		2		12:30-12:45	32		43			
12:45-1:00	16	63	4	18	81	12:45-1:00	39	165	40	169	334
1:00-1:15	11		4		1:00-1:15	38		41			
1:15-1:30	9		0		1:15-1:30	40		27			
1:30-1:45	7		6		1:30-1:45	48		38			
1:45-2:00	6	33	1	11	44	1:45-2:00	39	165	36	142	307
2:00-2:15	6		3		2:00-2:15	44		29			
2:15-2:30	7		2		2:15-2:30	40		42			
2:30-2:45	10		1		2:30-2:45	40		36			
2:45-3:00	7	30	4	10	40	2:45-3:00	45	169	32	139	308
3:00-3:15	4		1		3:00-3:15	47		32			
3:15-3:30	4		2		3:15-3:30	41		39			
3:30-3:45	6		6		3:30-3:45	47		34			
3:45-4:00	4	18	3	12	30	3:45-4:00	34	169	35	140	309
4:00-4:15	3		3		4:00-4:15	44		32			
4:15-4:30	3		5		4:15-4:30	44		28			
4:30-4:45	3		7		4:30-4:45	46		41			
4:45-5:00	3	12	3	18	30	4:45-5:00	36	170	43	144	314
5:00-5:15	2		10		5:00-5:15	40		30			
5:15-5:30	2		5		5:15-5:30	41		31			
5:30-5:45	5		9		5:30-5:45	32		35			
5:45-6:00	7	16	22	46	62	5:45-6:00	39	152	26	122	274
6:00-6:15	7		10		6:00-6:15	33		24			
6:15-6:30	8		19		6:15-6:30	40		38			
6:30-6:45	5		18		6:30-6:45	30		39			
6:45-7:00	5	25	19	66	91	6:45-7:00	35	138	22	123	261
7:00-7:15	14		18		7:00-7:15	39		32			
7:15-7:30	14		21		7:15-7:30	20		24			
7:30-7:45	11		29		7:30-7:45	30		16			
7:45-8:00	13	52	43	111	163	7:45-8:00	24	113	15	87	200
8:00-8:15	19		27		8:00-8:15	25		10			
8:15-8:30	17		30		8:15-8:30	13		13			
8:30-8:45	24		39		8:30-8:45	21		9			
8:45-9:00	24	84	43	139	223	8:45-9:00	22	81	9	41	122
9:00-9:15	29		35		9:00-9:15	14		14			
9:15-9:30	19		45		9:15-9:30	24		17			
9:30-9:45	21		45		9:30-9:45	17		11			
9:45-10:00	20	89	35	160	249	9:45-10:00	24	79	11	53	132
10:00-10:15	25		33		10:00-10:15	15		11			
10:15-10:30	22		34		10:15-10:30	23		12			
10:30-10:45	19		28		10:30-10:45	17		12			
10:45-11:00	22	88	45	140	228	10:45-11:00	23	78	13	48	126
11:00-11:15	45		44		11:00-11:15	18		13			
11:15-11:30	33		34		11:15-11:30	11		7			
11:30-11:45	29		35		11:30-11:45	15		9			
11:45-12:00	26	133	42	155	288	11:45-12:00	18	62	8	37	99
Total Vol	643		886		1529	1541		1245		2786	
Daily Totals						2184		2131		4315	

Location: Wildcat s/o Vicente				Barona				Volumes for Sun. 2/27/00				01450001su			
AM Period	NB		SB						PM Period	NB		SB			
12:00-12:15	10		5						12:00-12:15	39		47			
12:15-12:30	15		5						12:15-12:30	29		38			
12:30-12:45	17		9						12:30-12:45	38		28			
12:45-1:00	6	48	4	23	71				12:45-1:00	35	141	44	157	298	
1:00-1:15	14		4						1:00-1:15	41		29			
1:15-1:30	7		8						1:15-1:30	27		37			
1:30-1:45	4		2						1:30-1:45	36		41			
1:45-2:00	8	33	7	21	54				1:45-2:00	46	150	24	131	281	
2:00-2:15	6		2						2:00-2:15	32		35			
2:15-2:30	10		3						2:15-2:30	37		25			
2:30-2:45	10		3						2:30-2:45	32		42			
2:45-3:00	6	32	3	11	43				2:45-3:00	28	129	47	149	278	
3:00-3:15	3		2						3:00-3:15	38		35			
3:15-3:30	3		4						3:15-3:30	37		31			
3:30-3:45	4		3						3:30-3:45	41		38			
3:45-4:00	5	15	1	10	25				3:45-4:00	36	152	23	127	279	
4:00-4:15	7		2						4:00-4:15	35		39			
4:15-4:30	0		1						4:15-4:30	48		37			
4:30-4:45	6		3						4:30-4:45	49		40			
4:45-5:00	3	16	1	7	23				4:45-5:00	48	180	29	145	325	
5:00-5:15	4		8						5:00-5:15	45		21			
5:15-5:30	2		7						5:15-5:30	32		19			
5:30-5:45	3		10						5:30-5:45	45		22			
5:45-6:00	6	15	10	35	50				5:45-6:00	37	159	25	87	246	
6:00-6:15	5		8						6:00-6:15	29		18			
6:15-6:30	2		6						6:15-6:30	28		19			
6:30-6:45	6		15						6:30-6:45	35		10			
6:45-7:00	2	15	19	48	63				6:45-7:00	28	120	9	56	176	
7:00-7:15	6		15						7:00-7:15	28		5			
7:15-7:30	8		27						7:15-7:30	21		18			
7:30-7:45	3		32						7:30-7:45	18		7			
7:45-8:00	5	22	27	101	123				7:45-8:00	16	83	14	44	127	
8:00-8:15	14		15						8:00-8:15	18		12			
8:15-8:30	19		29						8:15-8:30	13		9			
8:30-8:45	16		37						8:30-8:45	25		17			
8:45-9:00	13	62	23	104	166				8:45-9:00	19	75	9	47	122	
9:00-9:15	17		20						9:00-9:15	24		10			
9:15-9:30	19		33						9:15-9:30	7		11			
9:30-9:45	16		29						9:30-9:45	6		4			
9:45-10:00	19	71	21	103	174				9:45-10:00	9	46	6	31	77	
10:00-10:15	25		45						10:00-10:15	14		8			
10:15-10:30	21		23						10:15-10:30	16		5			
10:30-10:45	17		40						10:30-10:45	14		6			
10:45-11:00	19	82	37	145	227				10:45-11:00	10	54	6	25	79	
11:00-11:15	28		35						11:00-11:15	7		5			
11:15-11:30	22		29						11:15-11:30	11		3			
11:30-11:45	20		40						11:30-11:45	8		5			
11:45-12:00	20	90	31	135	225				11:45-12:00	7	33	5	18	51	
Total Vol	501		743		1244					1322		1017		2339	
Daily Totals										1823		1760		3583	

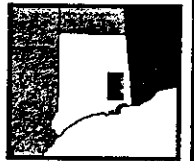




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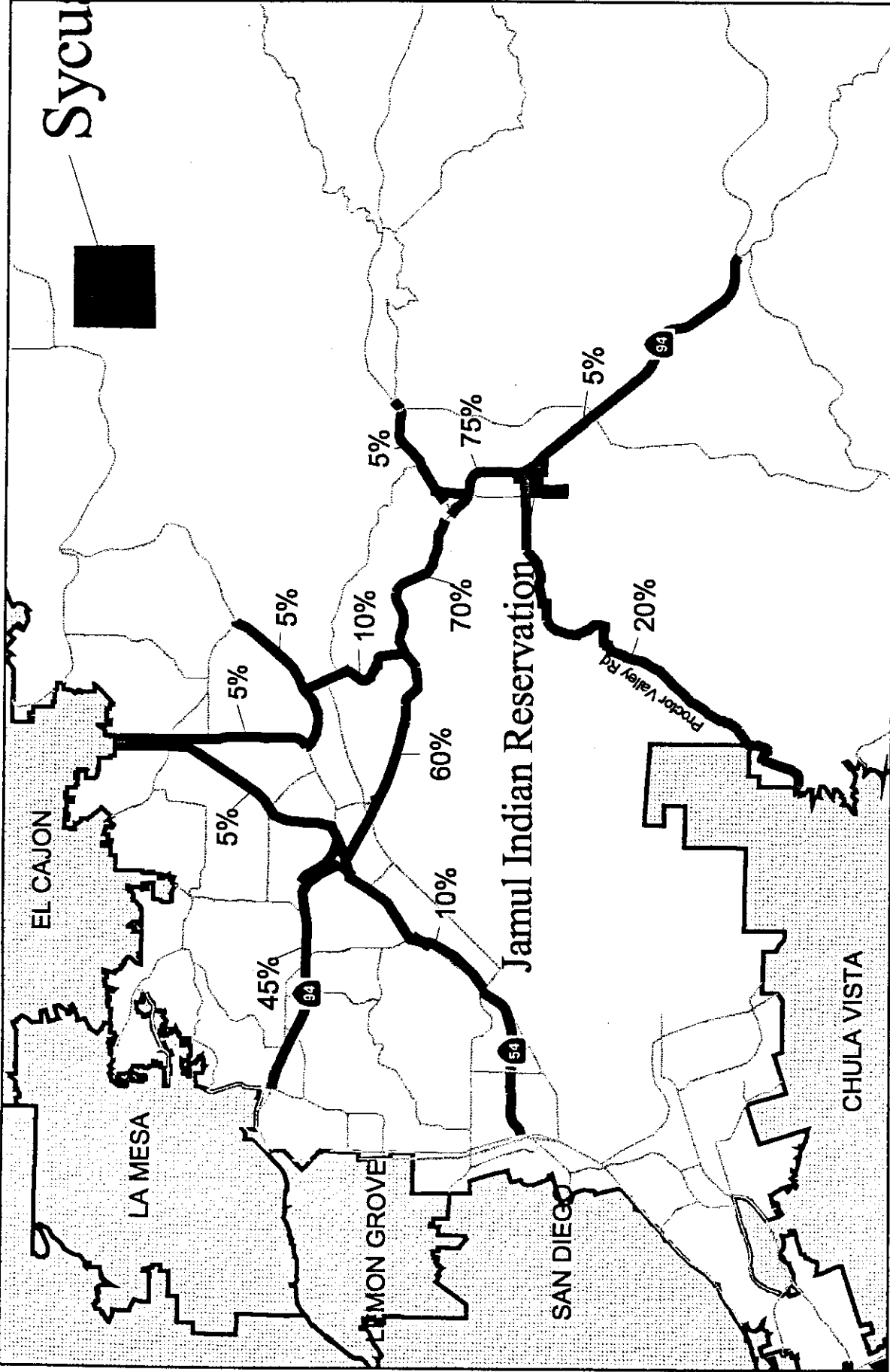


Jamul Reservation Near Term Trip Distribution



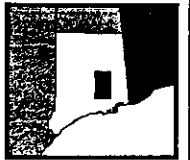
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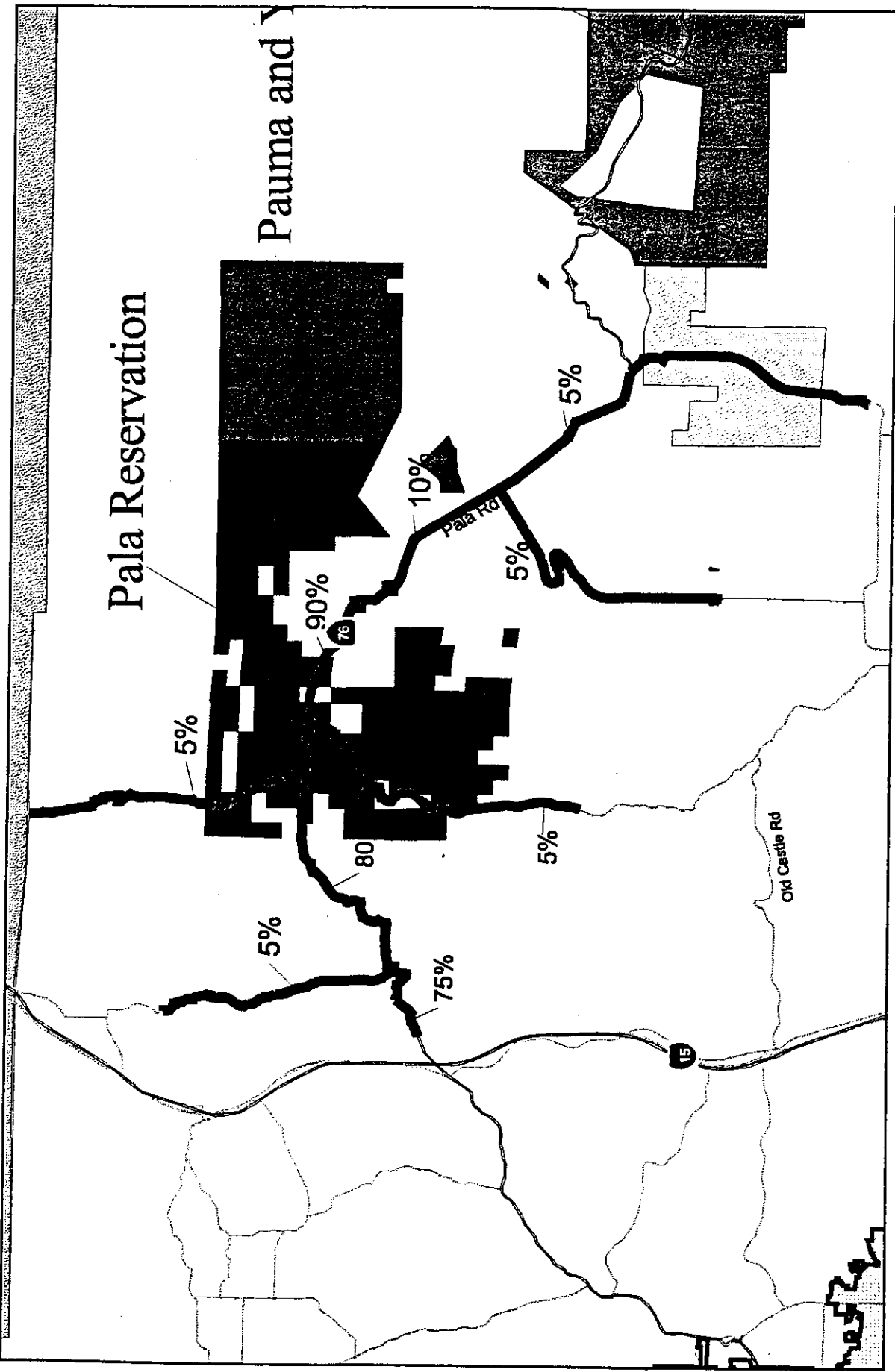
Sycu



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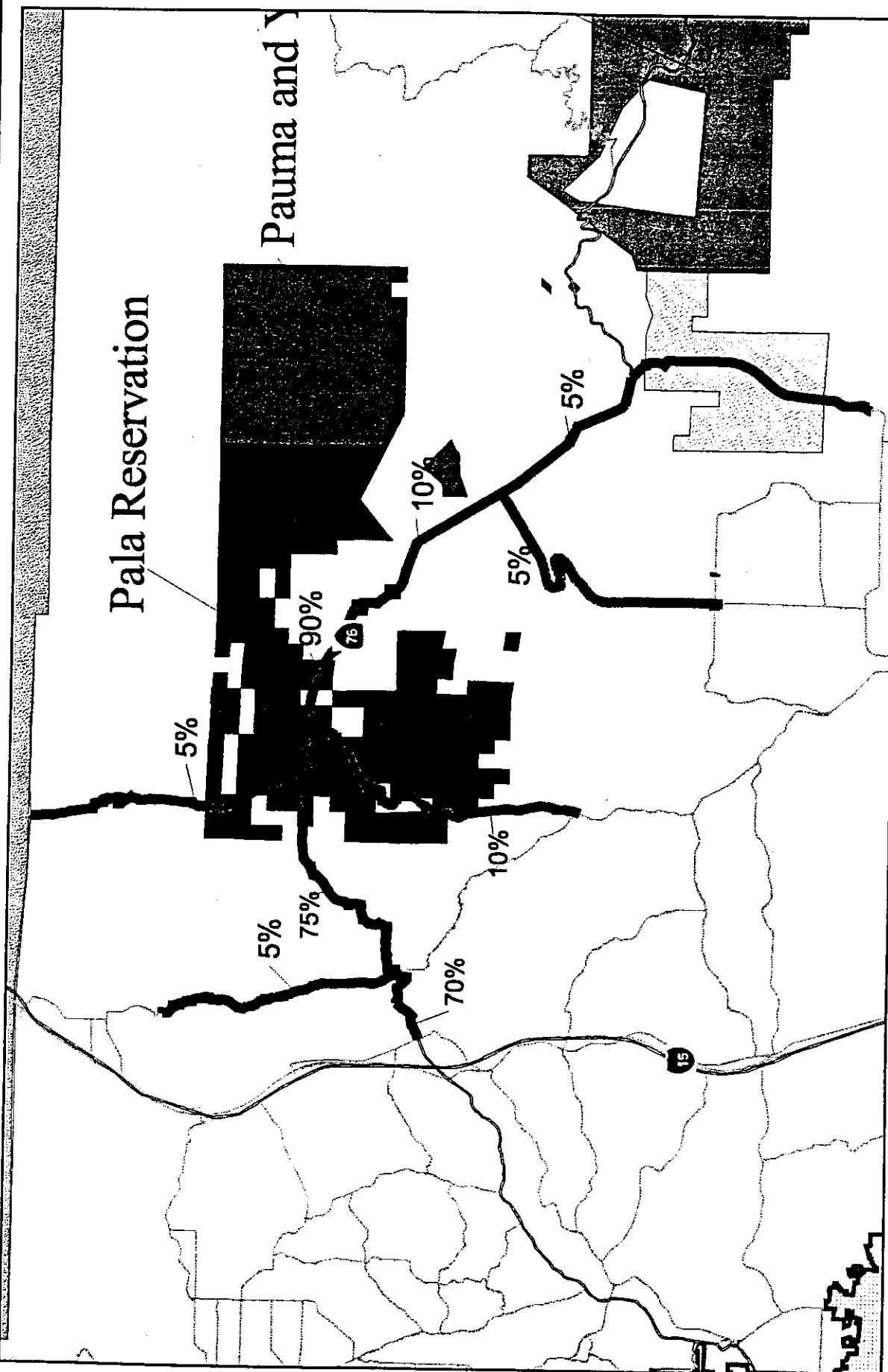
Jamul Reservation
Long Range 2020
Trip Distribution



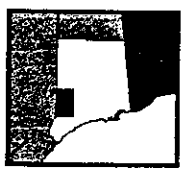


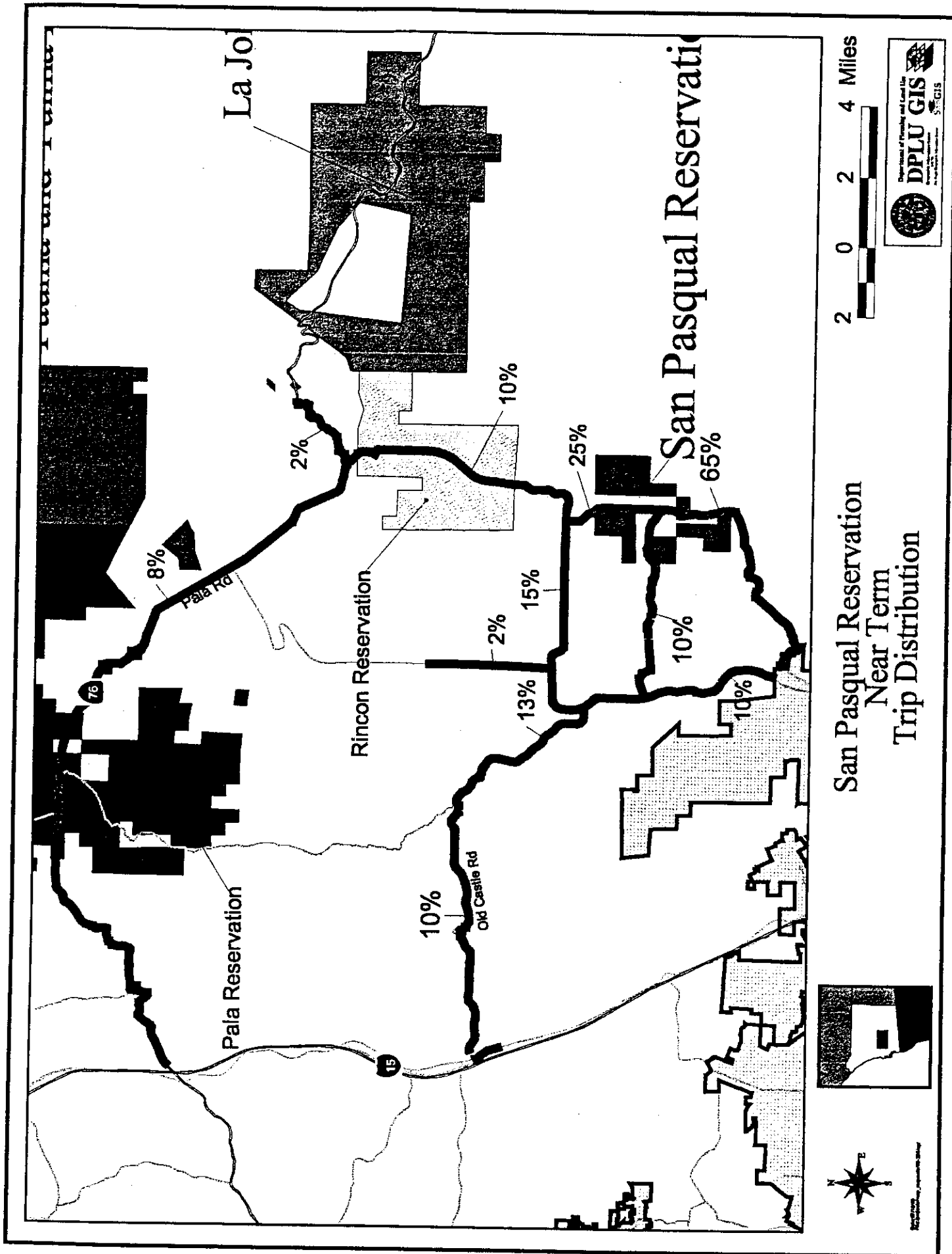
Pala Reservation
Near Term
Trip Distribution

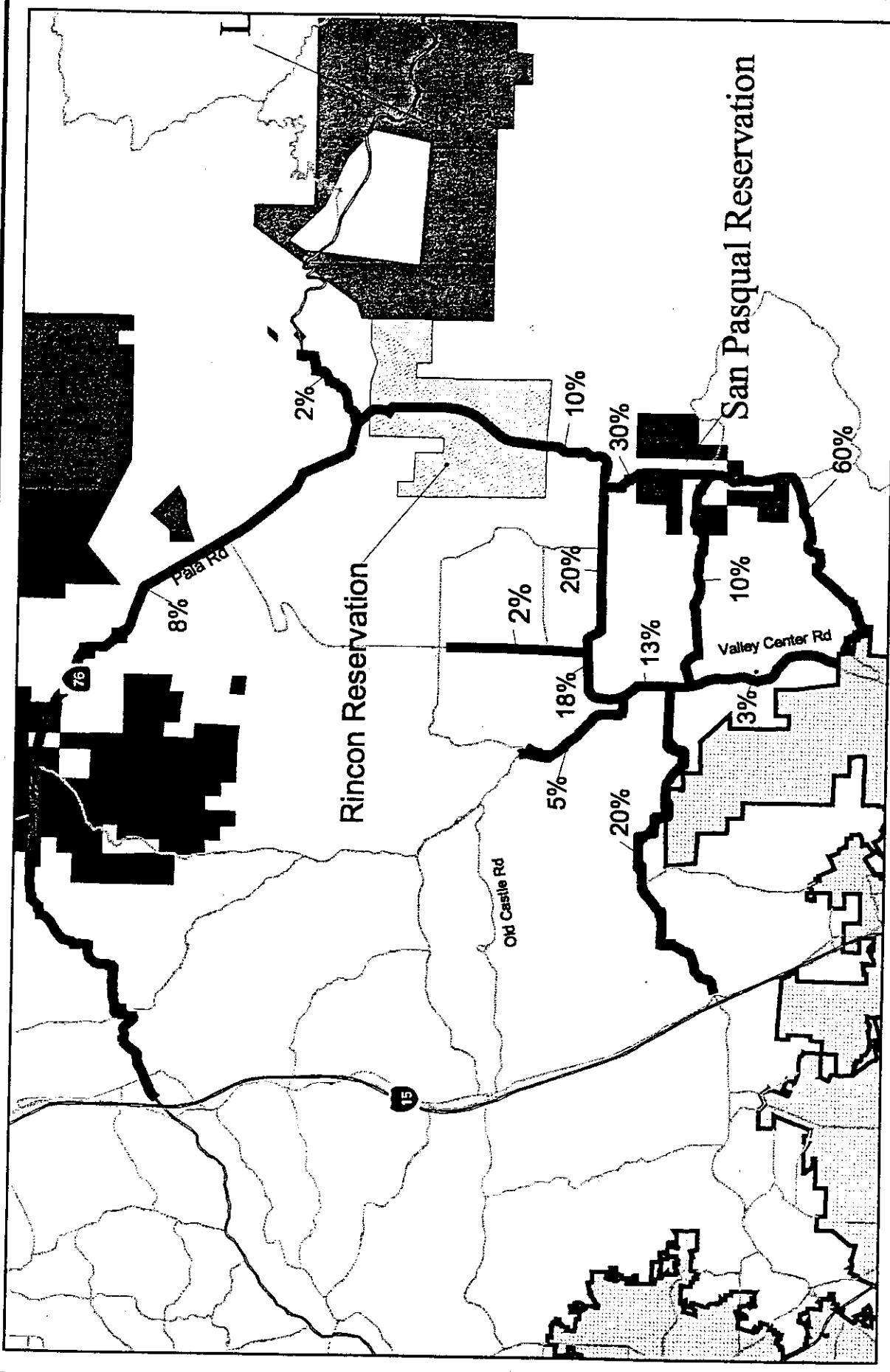




Pala Reservation
Long Range 2020
Trip Distribution



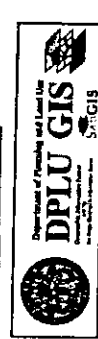
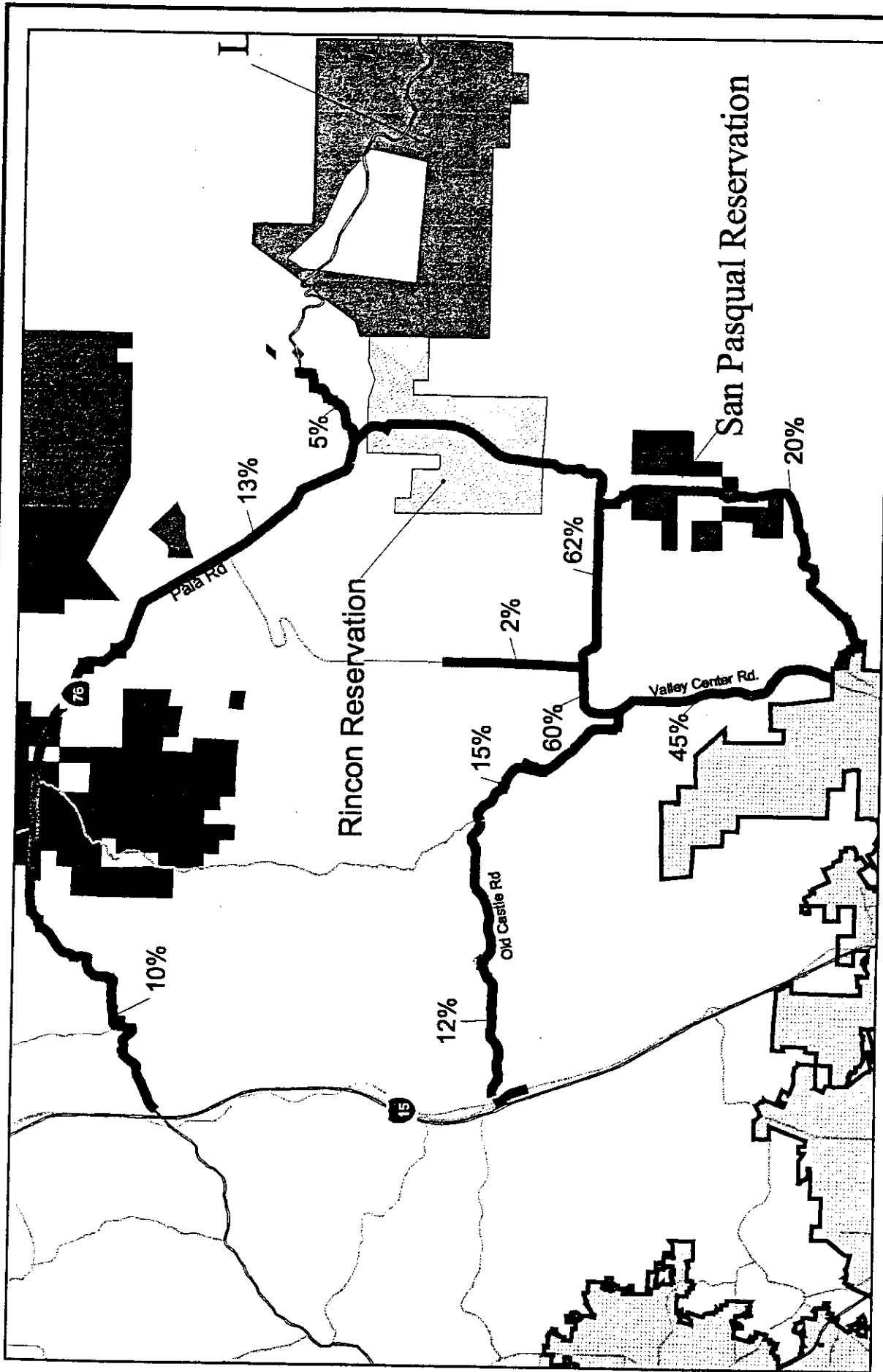




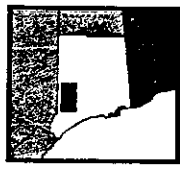
San Pasqual Reservation Long Range 2020 Trip Distribution



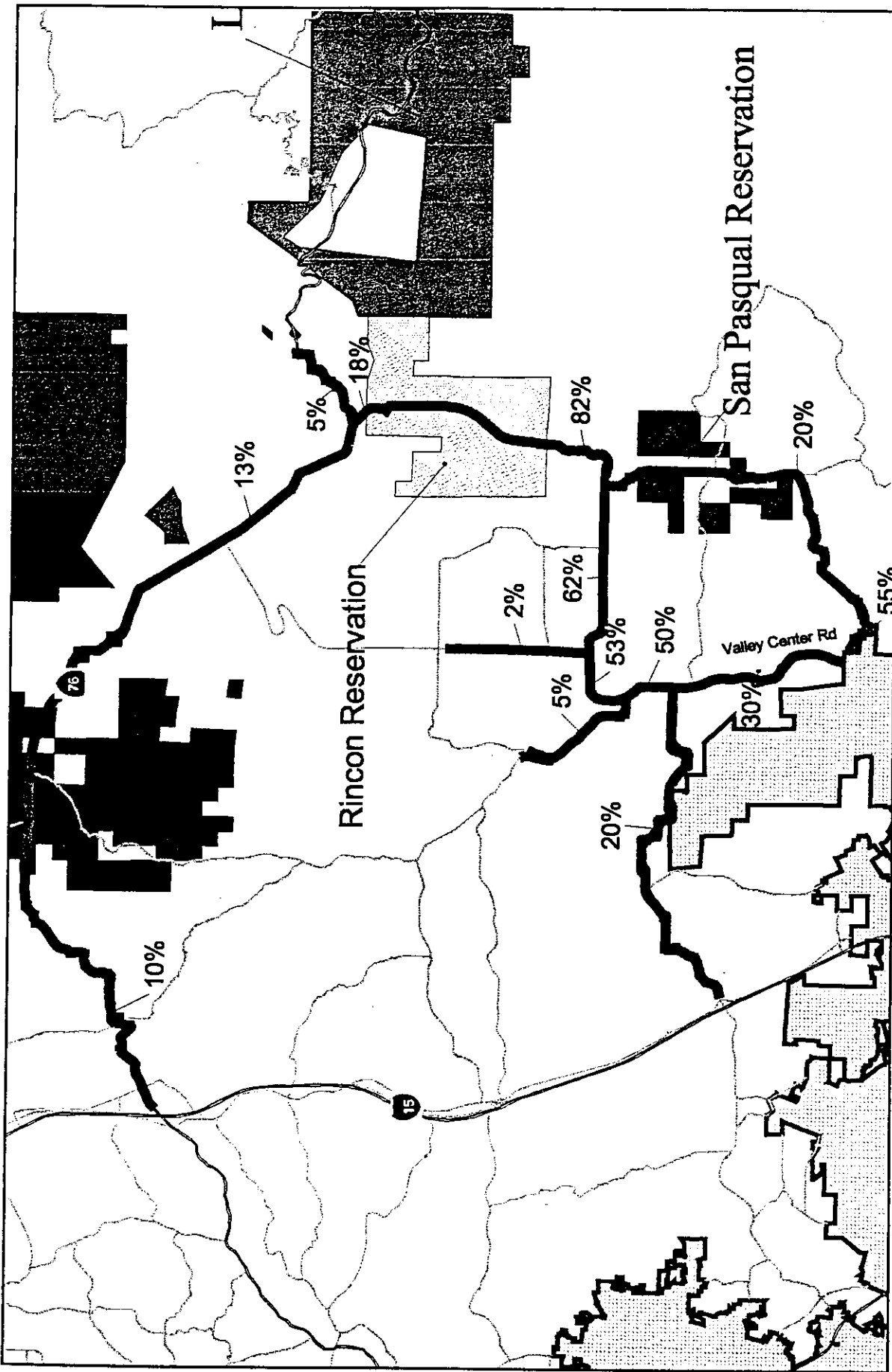
Map Date: 10/15/2019



Rincon Reservation Near Term Trip Distribution



Map Date: 10/10/2008



2 0 2 4 Miles

Rincon Reservation Long Range 2020 Trip Distribution



Map Date: 10/20/2010

TABLE 1
AVERAGE DAILY VEHICLE TRIPS

CIRCULATION ELEMENT ROADS		LEVEL OF SERVICE				
CLASS	X-SECTION	A	B	C	D	E
Expressway	126/146	<36,000	<54,000	<70,000	<86,000	<108,000
Prime Arterial	102/122	<22,200	<37,000	<44,600	<50,000	< 57,000
Major Road	78/98	<14,800	<24,700	<29,600	<33,400	< 37,000
Collector	64/84	<13,700	<22,800	<27,400	<30,800	< 34,200
Light Collector	40/60	< 1,900	< 4,100	< 7,100	<10,900	< 16,200
Rural Collector	40/84	< 1,900	< 4,100	< 7,100	<10,900	< 16,200
Rural Light Collector	40/60	< 1,900	< 4,100	< 7,100	<10,900	< 16,200
Recreational Parkway	40/100	< 1,900	< 4,100	< 7,100	<10,900	< 16,200
Rural Mountain	40/100	< 1,900	< 4,100	< 7,100	<10,900	< 16,200

NON-CIRC. ELEMENT ROADS		LEVEL OF SERVICE				
CLASS	X-SECTION	A	B	C	D	E
Residential Collector	40/60	*	*	< 4,500	*	*
Residential Road	36/56	*	*	< 1,500	*	*
Residential Cul-de-Sac or Loop Road	32/52	*	*	< 200	*	*

*Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

STATE OF CALIFORNIA - BUSINESS, TRANSPORTATION AND HOUSING AGENCY

GRAY DAVIS, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 11

P.O. BOX 85408, M.S. 50

SAN DIEGO, CA 92186-5406

PHONE: (619) 688-6954

FAX: (619) 688-4299



October 12, 2000

11-SD-67,76,94

Mr. Robert Goralka
County of San Diego
Department of Public Works
5201 Ruffin Road-MS 0336
San Diego, CA 92123-1666

Dear Mr. Goralka:

County Traffic Study of Indian Gaming Facility Impacts

As input to the County's Traffic Study of Indian Gaming Facility Impacts, we provide the following attachments for your information. The following discussion describes some of the background for the traffic numbers.

The existing-Average Daily Traffic (ADTs) are from the San Diego Association of Governments (SANDAG) 2000 Traffic Flow Map and represent 1999 traffic volumes. The existing Levels of Service (LOSs) for the non-State highway segments are derived from the County of San Diego ADT/LOS Threshold Tables. The LOSs for the State highway segments are derived from the City of San Diego standards.

The Year 2020 ADTs are from the SANDAG 2020 Buildout Forecast. The future LOSs were determined using the same methodology as for the existing ADTs and LOSs.

Find attached Trip Generation Summary Tables from the County of San Diego. These traffic generation figures are based on County driveway counts at Barona (130 daily trips/thousand sq. ft. of gaming area, with some additional trips for ancillary facilities, such as food service, golf course, and hotel).

Notes:

- The State Route 76 volumes include the proposed Gregory Canyon Landfill and the Palomar Quarry.
- The volumes shown assume the development of only the Barona, Sycuan, Viejas, San Pasqual and Pala casinos. This is due to available gaming square footage information. Twelve of the 18 tribes in San Diego County have signed compacts.

Mr. Robert Goralka
October 12, 2000
Page 2

In addition, Caltrans has roughly estimated the following costs for needed improvements to the State highway system. These estimates were developed without detailed assessment and should be used only for planning purposes. They are as follows:

- **State Route 67** – Six lanes from Maplevue Street to Willow Road;

\$13.4 million for implementation costs (\$1million for right of way, \$8 million for construction, and \$4.4 million for support)

\$28 million for environmental costs (\$8 million for an EIS/EIR, \$20 million for mitigation)

- **State Route 76** – Four lanes from Interstate Route 15 to Lilac Road;

\$87.8 million for implementation costs (\$7.5 million for right of way, \$56 million for construction, and \$24.3 million for support)

\$31 million for environmental costs (\$8 million for an EIS/EIR, \$23 million for mitigation)

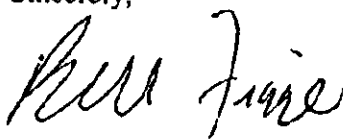
- **State Route 94** – Six lanes from State Route 125 to the Jamul Indian Village;

\$200.8 million for implementation costs (\$30.8 million for right of way, \$125.2 million for construction, and \$44.8 million for support)

\$33 million for environmental costs (\$8 million for an EIS/EIR, \$25 million for mitigation)

The above environmental mitigation costs include major wetland creation, plant establishment, and land purchases for wildlife refuges.

Sincerely,



BILL FIGGE, Chief
Development Review and Public Transportation Branch

Enclosure

Indian Gaming Report Near-Term Cumulative Scenario LOS E & F Roads

	Road	Segment	Near-term ADT	Near-term LOS (E/F)	Length of Segment (Miles)	Lanes Needed to Accommodate Traffic	Per Lane Mile Cost Factor	Cost to Implement
BARONA								
1	Mapleview St.	Ashwood St. to Lake Jennings Park Rd	127	E	0.70	2		
2	San Vicente Rd/11th St	Men St. to Hanson Lane	124	E	1.12	1		
3	San Vicente Rd	Hanson Lane to Wainook Dr	184	F	0.75	2		
4	San Vicente Rd	Wainook Dr. to Wildcat Canyon Rd	109	F	2.20	2		
5	San Vicente Rd	Wildcat Canyon Rd. to Quinn Stage Rd	132	E	1.71	1		
6	Wildcat Canyon Rd	San Vicente Rd. to Featherstone Canyon Rd	181	E	4.58	2		
7	Wildcat Canyon Rd	Featherstone Cyn Rd. to Barona Entrance	181	E	2.94	2		
8	Wildcat Canyon Rd	Barona Entrance to Willow Rd	233	F	5.06	3		
9	Willow Rd	SR67 to Wildcat Canyon Rd	188	F	0.91	2		
10	SR67	Willow Rd. to Mapleview St	434	F	1.22	+ 4c		13.4
JAMUL								
1	Jamacha Blvd	Sweetwater Rd. to Grand Ave	324	E	0.79	2		
2	Jamacha Blvd	Grand Ave. to Sweetwater Springs Blvd	314	E	1.66	2		
3	Jamacha Rd	Willow Glen Dr. to Hilldale Rd	321	E	1.27	2		
4	Jamacha Rd	Hilldale Rd. to Chase Ave	321	E	0.43	2		
5	Jamacha Rd	Chase Ave. to El Cajon City Limits	311	E	0.50	2		
13	SR94	SR125 to Avocado Blvd	66,332.3	D-F	3.22	+ 2 F		25.3
14	SR94 (Campo Rd)	Avocado Blvd. to Jamacha Rd	55,944.3	F	.95	+ 2 C		9.2
15	SR94 (Campo Rd)	Jamacha Rd. to Steele Canyon Rd	281	F	2.49	+ 4 C		93.8
16	SR94 (Campo Rd)	Steele Canyon Rd. to Lyons Valley Rd	459	F	1.97	+ 4 C		57.9
17	SR94 (Campo Rd)	Lyons Valley Rd. to Proctor Valley Rd	298	F	.37	+ 4 C		14.7
18	Steele Canyon Rd	Willow Glen Dr. to SR94 (Campo Rd)	70.6-16.8	E-F	1.48	2		
21	Willow Glen Dr	Steele Canyon Rd. to SR94 (Jamacha Rd)	201	F	0.78	2		
PALA, RINCON, SAN PASOVAL								
2	Cole Grade Rd	Cool Valley Rd. to Fruitvale Rd	119	E	1.32	1		
3	Cole Grade Rd	Fruitvale Rd. to Valley Center Rd	139	E	0.96	2		
4	Lake Wohlford Rd	Valley Center Rd. to Woods Valley Rd	117	E	1.67	1		
5	Lake Wohlford Rd	Woods Valley Rd. to Quepito Rd	199	F	1.44	2		
6	Lake Wohlford Rd	Quepito Rd. to Escondido City Limits	199	F	3.30	2		
10	Utac Rd	Old Castle Rd. to Anthony Rd	101	E	1.85	1		
11	Utac Rd	Anthony Rd. to Valley Center Rd	131	E	1.88	1		
16	SR76 (Pale Rd)	I-15 to Rice Canyon Rd	259	F	2.09	2 C		37.0
17	SR76 (Pale Rd)	Rice Canyon Rd. to Pale Temecula Rd	271	F	4.74	2 C		73.3
18	SR76 (Pale Rd)	Pale Temecula Rd. to Llad Rd	274	F	.24	2 C		7.5
21	Valley Center Rd	SR76 (Pale Rd) to Lake Wohlford Rd	127	E	5.00	1		
22	Valley Center Rd	Lake Wohlford Rd. to Cole Grade Rd	124	E	2.91	1		
23	Valley Center Rd	Cole Grade Rd. to Utac Rd	207	F	1.28	2		
24	Valley Center Rd	Utac Rd. to SC990 (Chertan Rd)	220	F	0.94	2		
25	Valley Center Rd	SC990 (Chertan Rd) to Escondido City Limits	229	F	2.81	2		
26	Valley Center Rd	Lake Wohlford Rd. to south of Lake Wohlford Rd	413	F				
SYGUAN								
3	Quepito Rd	Willow Glen Dr. to El Cajon City Limits	1012	D-E	1.99	1		
VIEJAS								
1	Willows Rd	West Willows Rd. to Viejas Entrance	134	E	2.27	1		

Bridge
4x106

Note: 1 = Existing ADT (Near-Term not applicable)

C: conventional
F: Freeway

TABLE E-1
Indian Gaming Report - Roadway Segment Levels of Service

Roadway	Segment	Existing ADT	Existing LOS	Existing with Temp. Project ADT	Existing with Temp. Project LOS	Existing with Perm. Project ADT	Existing with Perm. Project LOS	Near Term Cumulative ADT	Near Term Cumulative LOS	Build Out (Year 2020) ADT	Build Out (Year 2020) LOS	Build Out (Year 2020) with Project ADT	Build Out (Year 2020) with Project LOS	Build Out (Year 2020) Cumulative ADT	Build Out (Year 2020) Cumulative LOS
BARONA															
1 Ashwood St.	Willow Rd. to Mapleview St.	5	A			9.8	D	9.8	D	17-18	F	22.7	F	22.7	F
2 Dye Rd. / Ramona St.	Mussey Grade Rd. to San Vicente Rd.	4-5	A			7.5-8.5	D	7.5-8.5	D	9-12	A	12.5-15.5	A-B	12.5-15.5	A-B
4 Mapleview St.	Ashwood St. to Lake Jennings Park Rd.	13	E			17.7	E	17.7	E	21-28	B	25.5-32.5	B	25.5-32.5	B
5 San Vicente Rd.	Main St. to Hanson Lane	11	E			13.4	E	13.4	E	8-11	A	10.3-13.3	A	10.3-13.3	A
6 San Vicente Rd.	Hanson Lane to Dye Rd.	14	E			16.4	F	16.4	F	6	B	8.3	B	8.3	B
7 San Vicente Rd.	Dye Rd. to Wildcat Canyon Rd.	14	E			19.9	F	19.9	F	16	A	21.9	B	21.9	B
8 San Vicente Rd.	Wildcat Canyon Rd. to Gunn Stage Rd.	12	E			13.2	E	13.2	E	12	A	13.2	A	13.2	A
9 Wildcat Canyon Rd.	San Vicente Rd. to Painted Rock Rd.	9	D			16.1	E	16.1	E	5	C	12.1	E	12.1	E
10 Wildcat Canyon Rd.	Painted Rock Rd. to Barona Entrance	9	D			16.1	E	16.1	E	10	D	17.1	F	17.1	F
11 Wildcat Canyon Rd.	Barona Entrance to Willow Rd.	17	F			33.5	F	33.5	F	20-24	F	36.5-40.5	F	36.5-40.5	F
12 Willow Rd.	SR67 to Wildcat Canyon Rd.	8	D			19.8	F	19.8	F	12-13	E	23.8-24.8	F	23.8-24.8	F
13 SR67	Willow Rd. to Mapleview St.	32	F			43.8	F	43.8	F	41	F	52.8	F	52.8	F
CAMPO															
1 La Posta Rd.	SR94 to I-8	3	A							5-9	A-D				
2 Old Highway 80	La Posta Rd. to Live Oak Springs Rd.	0.9	A							2-15	A-B				
3 SR94	Buckman Springs Rd. to La Posta Rd.	1.1	A							7-13	C-D				
4 SR94	La Posta Rd. to Live Oak Springs Rd.	1.1	A							7-19	C-F				
CUYAPAPE															
1 Pine Hills Rd.	SR78/79 to Eagle Peak Rd.	1.4	A							3	B				
2 SR78/79	Wynola Rd. to Pine Hills Rd.	3.7	B							9-11	C				
3 SR78/79	Pine Hills Rd. to Main St. (Julian)	4.1	B							9	C				
4 Sunrise Highway	SR79 to Cuyapape Indian Reservation	.4	A							.2	A				
5 Sunrise Highway	Cuyapape Indian Reservation to Old Hwy 80	6	A							5	C				
JAMUL															
1 Jamacha Blvd.	Sweetwater Rd. to Grand Ave.	26	C			32.8	E	32.8	E						
2 Jamacha Blvd.	Grand Ave. to Sweetwater Springs Blvd.	25	C			31.8	E	31.8	E						
3 Jamacha Blvd.	Sweetwater Springs Blvd. to Campo Rd.	15	B			21.8	B	21.8	B						
4 Jamacha Rd.	Willow Glen Dr. to Hillsdale Rd.	27	C			32.1	E	32.1	E	16-20					
5 Jamacha Rd.	Hillsdale Rd. to Chase Ave.	27	C			32.1	E	32.1	E	18					
6 Jamacha Rd.	Chase Ave. to Washington Ave.	26	C			31.1	E	31.1	E	22					
7 Jefferson Rd.	SR94 (Campo Rd.) to Lyons Valley Rd.	3	B			4.7	C	4.7	C	7	A				
8 Lyons Valley Rd.	Skyline Truck Trail to SR94 (Campo Rd.)	6-8	C-D			7.7-9.7	D	7.7-9.7	D	23-25	C				
9 Proctor Valley Rd.	SR94 (Campo Rd.) to Chula Vista City Line	1-2	A			2.7-3.7	B	2.7-3.7	B	3-20	A-B				
10 SR54 (2020)	SR125 to SR94	n/a				n/a		n/a		24-34					
11 SR54 (2020)	SR94 to Furry Lane	n/a				n/a		n/a		19					
12 SR54 (2020)	Furry Lane to Jamacha Rd.	n/a				n/a		n/a		14-20					

TABLE E-1
Indian Gaming Report - Roadway Segment Levels of Service

Roadway	Segment	Existing ADT	Existing LOS	Existing with Temp. Project ADT	Existing with Temp. Project LOS	Existing with Perm. Project ADT	Existing with Perm. Project LOS	Near Term Cumulative ADT	Near Term Cumulative LOS	Build Out (Year 2020) ADT	Build Out (Year 2020) LOS	Build Out (Year 2020) with Project ADT	Build Out (Year 2020) with Project LOS	Build Out (Year 2020) Cumulative ADT	Build Out (Year 2020) Cumulative LOS
13 SR94	SR125 to Avocado Blvd.	51-77	C-E			66,392.3	D-F	66,392.3	D-F	80-125	C-E	95,314.3	D-F	95,314.3	D-F
14 SR94 (Campo Rd.)	Avocado Blvd. to Jamscha Rd.	40-49	E-F			55,364.3	F	55,364.3	F	71	D	86.3	E	86.3	E
15 SR94 (Campo Rd.)	Jamscha Rd. to Steele Canyon Rd.	16	E			38.1	F	38.1	F	49-53	F	69,473.4	F	69,473.4	F
16 SR94 (Campo Rd.)	Steele Canyon Rd. to Lyons Valley Rd.	17	E			45.9	F	45.9	F	52-54	F	75,877.8	F	75,877.8	F
17 SR94 (Campo Rd.)	Lyons Valley Rd. to Proctor Valley Rd.	9	C			39.6	F	39.6	F	23	F	48.5	F	48.5	F
18 SR94 (Campo Rd.)	Proctor Valley Rd. to Olay Lakes Rd.	9	C			10.7	C	10.7	C	18-22	F	23.7	F	23.7	F
19 Steele Canyon Rd.	Willow Glen Dr. to SR94 (Campo Rd.)	4-10	B-D			10.8-16.8	E-F	10.8-16.8	E-F	9-11	A	12,414.4	B	12,414.4	B
20 Willow Glen Dr.	Hillisdale Rd. to Steele Canyon Rd.	9	D			10.7	D	10.7	D	11	A	12.7	A	12.7	A
21 Willow Glen Dr.	Steele Canyon Rd. to SR54 (Jamscha Rd.)	15	E			20.1	F	20.1	F	19-20	B	20,721.7	C	20,721.7	C
LA JOLLA															
1 SR76	S. Grade Rd. to E. Grade Rd.	2	B					2.8	B	7	B			7.8	B
2 SR76	E. Grade Rd. to SR 79	1.4	B					2.2	B	5	B			5.2	B
3 SR79	Riverside/San Diego Ct. to San Felipe Rd.	1.3	B					1.3	B	2-12	B-D			2-12	B-D
4 SR79	San Felipe Rd. to SR76	2.4	B					2.4	B	10	C			10	C
5 SR79	SR76 to SR78 (Julian Rd.)	2.3	B					2.3	B	7-10	C			7-10	C
MANZANITA															
1 La Posta Rd.	SR94 to I-8	3	A							5-9	A-D				
2 Old Highway 80	La Posta Rd. to Live Oak Springs Rd.	0.9	A							2-15	A-B				
3 SR94	Buckman Springs Rd. to La Posta Rd.	1.1	A							7-13	C-D				
4 SR94	La Posta Rd. to Live Oak Springs Rd.	1.1	A							7-19	C-F				
MESA GRANDE															
1 SR76	S. Grade Rd. to E. Grade Rd.	2	B					2.8	B	7	B			7.8	B
2 SR76	E. Grade Rd. to SR 79	1.4	B					2.2	B	5	B			5.2	B
3 SR79	Riverside/San Diego Ct. to San Felipe Rd.	1.3	B					1.3	B	2-12	B-D			2-12	B-D
4 SR79	San Felipe Rd. to SR76	2.4	B					2.4	B	10	C			10	C
5 SR79	SR76 to SR78 (Julian Rd.)	2.3	B					2.3	B	7-10	C			7-10	C
PALA															
1 Cole Grade Rd.	SR76 (Pala Rd.) to Cool Valley Rd.	2	B					3.9	B	11-23	A-C	12,224.2	C	12,924.9	C
2 Cole Grade Rd.	Cool Valley Rd. to Fruitvale Rd.	10	D					11.9	E	21-32	B-E	22,233.2	E	22,933.9	E
3 Cole Grade Rd.	Fruitvale Rd. to Valley Center Rd.	12	E					13.9	E	34	E	35.2	F	35.9	F
4 Lake Wohlford Rd.	Valley Center Rd. to Woods Valley Rd.	4	B					11.7	E	9	A	-	-	18.1	F
5 Lake Wohlford Rd.	Woods Valley Rd. to Guelito Rd.	2	B					19.9	F	20	B	-	-	35.5	F
6 Lake Wohlford Rd.	Guelito Rd. to Valley Center Rd.	2	B					19.9	F	24	C	-	-	39.5	F
7 Liac Rd.	SR76 (Pala Rd.) to Couser Canyon Rd.	1	A					2.2	B	3	B	44.5.4	C	-	-
8 Liac Rd.	Couser Canyon Rd. to W. Liac Rd.	1	A					2.2	B	6	C	8.4	D	-	-
9 Liac Rd.	W. Liac Rd. to Old Castle Rd.	3	B					4.2	C	6	C	8.4	D	-	-
10 Liac Rd.	Old Castle Rd. to Anthony Rd.	8	D					8.7	D	6.8	A	7,29.2	A	8.8-10.8	-

TABLE E-1
Indian Gaming Report - Roadway Segment Levels of Service

Roadway	Segment	Existing ADT	Existing LOS	Existing with Temp. Project ADT	Existing with Temp. Project LOS	Existing with Perm. Project ADT	Existing with Perm. Project LOS	Near Term Cumulative ADT	Near Term Cumulative LOS	Build Out (Year 2020) ADT	Build Out (Year 2020) LOS	Build Out (Year 2020) with Project ADT	Build Out (Year 2020) with Project LOS	Build Out (Year 2020) Cumulative ADT	Build Out (Year 2020) Cumulative LOS
11 Lilac Rd.	Anthony Rd. to Valley Center Rd.	8	D			8.7	D	13.1	E	17	B	18.2	B	19.8	
12 Pala Temecula Rd.	Riv/S.D. County Line to SR76 (Pala Rd.)	3	B			4.2	C	4.2	C	6-18	B-E	7.2-19.2	C-F	7.2-19.2	C-F
13 Rice Canyon Rd.	Rainbow Valley Blvd. to SR76 (Pala Rd.)	1	A			2.2	B	2.2	B	3-5	B	4.2-6.2	B	4.2-6.2	B
14 SR76 (Pala Rd.)	I-15 to Rice Canyon Rd.	5	B			23.2	F	25.9	F	26	F	43	F	45.7	F
15 SR76 (Pala Rd.)	Rice Canyon Rd. to Pala Temecula Rd.	5	B			24.4	F	27.1	F	21	F	39.2	F	41.9	F
16 SR76 (Pala Rd.)	Pala Temecula Rd. to Lilac Rd.	5	B			24.4	F	27.4	F	8	C	27.2	F	33.6	F
17 SR76 (Pala Rd.)	Lilac Rd. to Cole Grade Rd.	3	B			5.4	B	8.4	C	8	C	10.4	C	13.4	E
18 SR76 (Pala Rd.)	Cole Grade Rd. to Valley Center Rd.	3	B			4.2	B	7.2	C	7	C	8.2	C	11.8	D
19 SR76	Valley Center Rd. to S. Grade Rd.	4	B			-	-	4.6	B	7-11	C	-	-	-	-
20 Valley Center Rd.	SR76 (Pala Rd.) to Lake Wohlford Rd.	3	B			4.2	C	12.7	E	14	B	15.2	B	23.7	C
PAUMA															
1 Cole Grade Rd.	SR76 (Pala Rd.) to Cool Valley Rd.	2	B					3.9	B	11-23	A-C			12.9-24.9	C
2 Cole Grade Rd.	Cool Valley Rd. to Fruitvale Rd.	10	D					11.9	E	21-32	B-E			22.9-33.9	E
3 Cole Grade Rd.	Fruitvale Rd. to Valley Center Rd.	12	E					13.9	E	34	E			35.9	F
4 Lake Wohlford Rd.	Valley Center Rd. to Woods Valley Rd.	4	B					11.7	E	9	A			18.1	F
5 Lake Wohlford Rd.	Woods Valley Rd. to Guajito Rd.	2	B					19.9	F	20	B			35.5	F
6 Lake Wohlford Rd.	Guajito Rd. to Valley Center Rd.	2	B					19.9	F	24	C			39.5	F
7 Lilac Rd.	SR76 (Pala Rd.) to Couser Canyon Rd.	1	A					-	-	3	B			-	-
8 Lilac Rd.	Couser Canyon Rd. to W. Lilac Rd.	1	A					-	-	6	C			-	-
9 Lilac Rd.	W. Lilac Rd. to Old Castle Rd.	3	B					-	-	6	C			-	-
10 Lilac Rd.	Old Castle Rd. to Anthony Rd.	8	D					13.1	E	6-8	A			8.8-10.8	
11 Lilac Rd.	Anthony Rd. to Valley Center Rd.	8	D					13.1	E	17	B			19.8	
12 Pala Temecula Rd.	Riv/S.D. County Line to SR76 (Pala Rd.)	3	B					4.2	C	6-18	B-E			7.2-19.2	C-F
13 Rice Canyon Rd.	Rainbow Valley Blvd. to SR76 (Pala Rd.)	1	A					2.2	B	3-5	B			4.2-6.2	B
14 SR76 (Pala Rd.)	I-15 to Rice Canyon Rd.	5	B					25.9	F	26	F			45.7	F
15 SR76 (Pala Rd.)	Rice Canyon Rd. to Pala Temecula Rd.	5	B					27.1	F	21	F			41.9	F
16 SR76 (Pala Rd.)	Pala Temecula Rd. to Lilac Rd.	5	B					27.4	F	9	C			33.6	F
17 SR76 (Pala Rd.)	Lilac Rd. to Cole Grade Rd.	3	B					8.4	C	8	C			13.4	E
18 SR76 (Pala Rd.)	Cole Grade Rd. to Valley Center Rd.	3	B					7.2	C	7	C			11.8	D
19 SR76	Valley Center Rd. to S. Grade Rd.	4	B					4.6	B	7-11	C			-	-
20 Valley Center Rd.	SR76 (Pala Rd.) to Lake Wohlford Rd.	3	B					12.7	E	14	B			23.7	C
RINCON															
1 Cole Grade Rd.	SR76 (Pala Rd.) to Cool Valley Rd.	2	B			2.2	B	3.9	B	11-23	A-C			12.9-24.9	C
2 Cole Grade Rd.	Cool Valley Rd. to Fruitvale Rd.	10	D			10.2	D	11.9	E	21-32	B-E			22.9-33.9	E
3 Cole Grade Rd.	Fruitvale Rd. to Valley Center Rd.	12	E			12.2	E	13.9	E	34	E			35.9	F
4 Lake Wohlford Rd.	Valley Center Rd. to Woods Valley Rd.	4	B			5.5	C	11.7	E	9	A			18.1	F
5 Lake Wohlford Rd.	Woods Valley Rd. to Guajito Rd.	2	B			3.5	B	19.9	F	20	B			35.5	F

TABLE E-1
Indian Gaming Report - Roadway Segment Levels of Service

Roadway	Segment	Existing ADT	Existing LOS	Existing with Temp. Project ADT	Existing with Temp. Project LOS	Existing with Perm. Project ADT	Existing with Perm. Project LOS	Near Term Cumulative ADT	Near Term Cumulative LOS	Build Out (Year 2020) ADT	Build Out (Year 2020) LOS	Build Out (Year 2020) with Project ADT	Build Out (Year 2020) with Project LOS	Build Out (Year 2020) Cumulative ADT	Build Out (Year 2020) Cumulative LOS
6 Lake Wohlford Rd.	Guejito Rd. to Valley Center Rd.	2	B	2.5	B	3.5	B	19.9	F	24	C	25.5	C	39.5	F
7 Lilac Rd.	SR76 (Pala Rd.) to Couser Canyon Rd.	1	A	-	-	-	-	-	-	3	B	-	-	-	-
8 Lilac Rd.	Couser Canyon Rd. to W. Lilac Rd.	1	A	-	-	-	-	-	-	6	C	-	-	-	-
9 Lilac Rd.	W. Lilac Rd. to Old Castle Rd.	3	B	-	-	-	-	-	-	6	C	-	-	-	-
10 Lilac Rd.	Old Castle Rd. to Anthony Rd.	8	D	8.3	D	8.9	D	13.1	E	6-8	A	6.4-8.4	A	8.8-10.8	-
11 Lilac Rd.	Anthony Rd. to Valley Center Rd.	8	D	8.3	D	8.9	D	13.1	E	17	B	17.4	B	19.8	-
12 Old Castle Rd.	Lilac Rd. to Champagne Blvd.	6	C	6.3	C	6.9	C	9.4	D	6-10	C-D	6.2-10.2	A	7.2-11.2	DE
13 SC990 (Mountain Meadow Rd.)	Valley Center Rd. to N. Broadway	n/a	-	-	-	-	-	-	-	10-11	A	11.5-12.5	A	16.4	B
14 SC990 (Mountain Meadow Rd.)	N. Broadway to I-15	n/a	-	-	-	-	-	-	-	6-19	A-B	7.5-20.5	A-B	24.4	B
15 SR76	Valley Center Rd. to S. Grade Rd.	4	B	4.1	B	4.4	B	4.8	B	7-11	C	7.4-11.4	C	13	D
16 SR76 (Pala Rd.)	I-15 to Rice Canyon Rd.	5	B	5.3	B	5.7	C	25.9	F	26	F	26.8	F	45.7	F
17 SR76 (Pala Rd.)	Rice Canyon Rd. to Pala Temecula Rd.	5	B	5.3	B	5.7	C	27.1	F	21	F	21.8	F	41.9	F
18 SR76 (Pala Rd.)	Pala Temecula Rd. to Lilac Rd.	5	B	5.3	B	6.0	C	27.4	F	9	C	9.8	C	33.6	F
19 SR76 (Pala Rd.)	Lilac Rd. to Cole Grade Rd.	3	B	3.3	B	4.0	B	8.4	C	8	C	9.0	C	13.4	E
20 SR76 (Pala Rd.)	Cole Grade Rd. to Valley Center Rd.	3	B	3.3	B	4.0	B	7.2	C	7	C	8.0	C	11.8	D
21 Valley Center Rd.	SR76 (Pala Rd.) to Lake Wohlford Rd.	3	B	5.1	C	9.1	D	12.7	E	8-14	B	14.1-20.1	A-B	23.7	C
22 Valley Center Rd.	Lake Wohlford Rd. to Cole Grade Rd.	4	B	5.4	C	8.6	D	12.4	E	8-12	A	12.6-16.6	A-B	21.6	B
23 Valley Center Rd.	Cole Grade Rd. to Lilac Rd.	16	E	17.3	F	20.4	F	23.7	F	46-47	D	51.3	E	55.7	E
24 Valley Center Rd.	Lilac Rd. to SC990	17	F	18	F	20.4	F	23.0	F	51-53	E	55.4	E	59.9	F
25 Valley Center Rd.	SC990 to Lake Wohlford Rd.	18	F	19	F	21.4	F	22.9	F	52	E	54.4	E	54.4	E
26 Valley Center Rd.	Lake Wohlford Rd. to south of Lake Wohlford Rd.	20	F	21.5	F	24.8	F	41.3	F	74	F	76.4	F	91.7	F
SAN PASQUAL															
1 Cole Grade Rd.	SR76 (Pala Rd.) to Cool Valley Rd.	2	B	2.1	B	2.5	B	3.9	B	11-23	A-C	11.5-23.5	A-C	12.9-24.9	C
2 Cole Grade Rd.	Cool Valley Rd. to Fruitvale Rd.	10	D	10.1	D	10.5	D	11.9	E	21-32	B-E	21.5-37.5	B-E	22.9-33.9	E
3 Cole Grade Rd.	Fruitvale Rd. to Valley Center Rd.	12	E	12.1	E	12.5	E	13.9	E	34	E	34.5	F	35.9	F
4 Lake Wohlford Rd.	Valley Center Rd. to Woods Valley Rd.	4	B	5.3	C	10.3	D	11.7	E	9	A	16.6	B-E	18.1	F
5 Lake Wohlford Rd.	Woods Valley Rd. to Guejito Rd.	2	B	5.4	C	18.5	F	19.9	F	20	B	34	E	35.5	F
6 Lake Wohlford Rd.	Guejito Rd. to Valley Center Rd.	2	B	5.4	C	18.5	F	19.9	F	24	C	38	E-F	39.5	F
7 Lilac Rd.	SR76 (Pala Rd.) to Couser Canyon Rd.	1	A	1.2	A	1.8	A	-	-	3	B	3.2	B-E	-	-
8 Lilac Rd.	Couser Canyon Rd. to W. Lilac Rd.	1	A	1.2	A	1.8	A	-	-	6	C	6.2	C	-	-
9 Lilac Rd.	W. Lilac Rd. to Old Castle Rd.	3	B	3.2	B	3.8	B	-	-	6	C	6.2	C	-	-
10 Lilac Rd.	Old Castle Rd. to Anthony Rd.	8	D	8.7	D	11.3	E	13.1	E	6-8	A	9	A-C	8.8-10.8	-
11 Lilac Rd.	Anthony Rd. to Valley Center Rd.	8	D	8.7	D	11.3	E	13.1	E	17	B	18	-	19.8	-
12 Old Castle Rd.	Lilac Rd. to Champagne Blvd.	6	C	6.5	C	8.5	D	9.4	D	6-10	C-D	7-11	C-E	7.2-11.2	DE
13 SC990 (Mountain Meadow Rd.)	Valley Center Rd. to N. Broadway	n/a	-	-	-	-	-	-	-	10-11	A	16.1	B	16.4	B
14 SC990 (Mountain Meadow Rd.)	N. Broadway to I-15	n/a	-	-	-	-	-	-	-	6-19	A-B	24.1	B	24.4	B
15 SR76	Valley Center Rd. to S. Grade Rd.	4	B	4.1	B	4.5	B	4.6	B	7-11	C	13	D	13	D

TABLE E-1
Indian Gaming Report - Roadway Segment Levels of Service

Roadway	Segment	Existing ADT	Existing LOS	Existing with Temp. Project ADT	Existing with Temp. Project LOS	Existing with Perm. Project ADT	Existing with Perm. Project LOS	Near Term Cumulative ADT	Near Term Cumulative LOS	Build Out (Year 2020) ADT	Build Out (Year 2020) LOS	Build Out (Year 2020) with Project ADT	Build Out (Year 2020) with Project LOS	Build Out (Year 2020) Cumulative ADT	Build Out (Year 2020) Cumulative LOS
16	SR76 (Pala Rd.)	5	B	5.4	B	7	B	25.9	F	26	F	28	F	45.7	F
17	SR76 (Pala Rd.)	5	B	5.4	B	7	B	27.1	F	21	F	23	F	41.9	F
18	SR76 (Pala Rd.)	5	B	5.4	B	7	B	27.4	F	9	C	11	D	33.6	F
19	SR76 (Pala Rd.)	3	B	3.4	B	5	B	8.4	C	8	C	10	C	13.4	E
20	SR76 (Pala Rd.)	3	B	3.4	B	5	B	7.2	C	7	B	9	C	11.8	D
21	Valley Center Rd.	3	B	3.5	B	5.5	C	12.7	E	14	B	16.5	B	23.7	C
22	Valley Center Rd.	4	B	4.8	C	7.8	D	12.4	E	8-12	A	17.1	B	21.6	B
23	Valley Center Rd.	16	E	16.7	F	19.3	F	23.7	F	46-47	D	51.6	E	55.7	E
24	Valley Center Rd.	17	F	17.5	F	19.5	F	23.0	F	51-53	E	56.3	E	59.9	F
25	Valley Center Rd.	18	F	17.5	F	19.5	F	22.9	F	52	E	52	E	54.4	E
26	Valley Center Rd.	20	F	23.4	F	36.5	F	41.3	F	74	F	88	F	91.7	F
27	Woods Valley Rd.	2	B	2.5	B	4.5	C	4.5	C	8-11	C-E	10.5-13.5	DE	10.5-13.5	D-F
SYCUAN															
1	Dehesa Rd.	10	D							3-14	B-E				
2	Dehesa Rd.	10	D							14-16	A-B				
3	Dehesa Rd.	10-12	D-E							13-18	A-B				
4	Frances Dr.	1	A							3	A				
5	Harbison Canyon Rd.	2	A							3-5	B-C				
6	Harbison Canyon Rd.	4	B							4-5	B-C				
7	Willows Rd.	3.4	B							10-14	A-B				
8	Willows Rd.	2	B							20	B				
VIEJAS															
1	Willows Rd.	13.4	E							10-14	A-B				
2	Willows Rd.	2	B							20	B				
3	I-8	35	B							51	C				

Notes: ADT = Average Daily Traffic / LOS = Level of Service / * = X 1,000 / ~ = Distributed onto New SR54 in 2020

Appendix B

Pertinent Sections of the County of San Diego Noise Ordinance and the Noise Element of the County of San Diego General Plan

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Appendix B

Pertinent Sections of the San Diego County Noise Ordinance and The Noise Element of the San Diego County General Plan

County Noise Ordinance

SECTION 36.410. CONSTRUCTION EQUIPMENT.

Except for emergency work, it shall be unlawful for any person, including the County of San Diego, to operate construction equipment at any construction site, except as outlined in subsections (a) and (b) below:

(a) It shall be unlawful for any person, including the County of San Diego, to operate construction equipment at any construction site on Sundays, and days appointed by the President, Governor, or the Board of Supervisors for a public fast, Thanksgiving, or holiday. Notwithstanding the above, a person may operate powered construction equipment on the above specified days between the hours of 10 a.m. and 5 p.m. in compliance with the requirements of subdivision (b) of this Section at his residence or for the purpose of constructing a residence for himself, provided such operation of construction equipment is not carried on for profit or livelihood. In addition, it shall be unlawful for any person to operate construction equipment at any construction site on Monday through Saturdays except between the hours of 7 a.m. and 7 p.m.

b) No such equipment, or combination of equipment regardless of age or date of acquisition, shall be operated so as to cause noise at a level in excess of seventy-five (75) decibels for more than 8 hours during any twenty-four (24) period when measured at or within the property lines of any property which is developed and used either in part or in whole for residential purposes.

In the event that lower noise limit standards are established for construction equipment pursuant to State or Federal law, said lower limits shall be used as a basis for revising and amending the noise level limits specified in subsection (b) above.

County Noise Element

Policy 4b of the Noise Element of the General Plan specifies that "Whenever it appears that new development will result in any (existing or future) noise sensitive area being subjected to noise levels of CNEL equal to 60 decibels or greater, an acoustical study should be required". The Noise Element defines "noise sensitive area" as "the building site of any residence, hospital, school, library, or similar facility where quiet is an important attribute of the environment."

According to the Noise Element of the General Plan, if the acoustical study shows that noise level at any noise sensitive area will exceed CNEL equal to 60 decibels, the development should not be approved unless the following findings are made:

- A. Modifications to the development have been made or will be made which reduce the exterior noise level below CNEL equal to 60 decibels; or
- B. If with current noise abatement technology it is infeasible to reduce exterior CNEL to 60 decibels, then modifications to the development have been or will be made which reduce interior noise below CNEL equal to 45 decibels. Particular attention shall be given to noise sensitive interior spaces such as bedrooms. And,
- C. If finding "B" above is made, a further finding is made that there are specifically identified overriding social or economic considerations which warrant approval of the development without modifications as described in "A" above.